United States District Court Northern District of Texas Amarillo Division

KIMBERLY D. POLLARD J.S. (MINOR CHILD)	888	Cause No. 2:16-CV-238-J
PLAINTIFFS,	§	0/100211012110 01 200 0
V.	999	
CHURCH OF GOD IN CHRIST, AN	§	PLAINTIFFS'-POLLARD'S & J.S.'-
ACTIVE	§	RESPONSE TO SUMMARY JUDGMENT
Domestic Tennessee	§	
Nonprofit Corporation; and	§	
CHURCH OF GOD IN CHRIST,	§	
BOARD OF	§	
BISHOPS, AND, BISHOP JAMES	Ş	
L'KEITH	000000	
Jones	8	
_	8	
Defendants.	3	

Now comes Plaintiffs and in response to defendants' motion for summary judgment shows in support the following:

1. Plaintiffs rely on depositions and documents not filed with the court. Plaintiffs attach and incorporate the same herein.

Exhibit A	Affidavit of Kimberly Pollard
Exhibit B	Judgment of the Board of Bishops of COGIC, Inc. re Jones
Exhibit C	Wells Fargo Bank Statement, produced by James Jones at
	deposition
Exhibit D	Notice of Deposition
Exhibit E	Deposition of James Jones, transcript

- Exhibit F Wells Fargo Bank Statement¹ Exhibit G Affidavit of Kimberly Pollard
- 2. Additionally, there is an mp4 audio file of Jones saying he'll date J.S. Plaintiff will upload the file to pacer.
- 3. Plaintiffs attempted to convert the video recording of James Jones' deposition from cassette to digital format. Plaintiff was unable to convert.
- 4. Plaintiffs' suit is, at it's core, based on Jones' conduct of grooming J.S.
- 5. Here, Jones sent private messages to J.S., used "sexy" to describe J.S., and told Pollard–J.S.' mother–that Jones would date J.S. when J.S. turned 18. See Exhibit G, p. 5, paragraph 10.
- 6. Alarmingly, Jones had a sexual relationship with Pollard, when Pollard was a minor. That illicit abusive relationship is the context of Jones' messages to J.S.
- 7. Jones use of "sexy" to describe J.S., Jones' statement that he would date J.S. when she turned 18, and his messages to J.S. constitute extreme and outrageous conduct because Jones', was grooming J.S. for sexually exploitive relationship with a minor, as he did with Pollard.
- 8. Plaintiffs do not believe that current applicable law—the statute of limitations—contemplates suit based on Jones' sexual abuse of Pollard when she was a minor.

Argument & Authority

- 9. Despite Defendants' liberal claim of "ecclesiastical duties", the conduct of both Church of God in Christ (COGIC) and James Jones (Jones) reveal an employer-employee relationship.
- 10. Moreover, the disciplinary procedures related to Jones extra-marital

¹ Produced by Jones in response to notice of deposition, exhibit D.

relationships contemplate that COGIC acknowledges and admits that Jones used his position to facilitate his relationship with Kimberly Pollard (Pollard).

- 11. To successfully prosecute a claim of negligent hiring, supervision, or retention, a plaintiff is required to show that: (1) the employer owed a legal duty to protect third parties from the employee's actions; and (2) the third party sustained damages proximately caused by the employer's breach of that legal duty.²
- 12. A negligence claim requires proof of a legal duty owed by the defendant to the plaintiff, a breach of that duty, and damages proximately caused by that breach.³ An employer can be liable for negligence if its failure to use due care in hiring, supervising, or retaining an employee creates an unreasonable risk of harm to others.⁴
- 13. That Jones held a employment or position with the defendant-COGIC ("the church") and used that position to further his abuses of plaintiffs is directly and incontrovertibly contemplated in the church's findings and judgment against Jones. See Exhibit B:

"WHEREFORE, the Grievance Committee finds there is just cause to believe that Bishop James L'Keith Jones, Jurisdictional Prelate of the New Mexico Jurisdiction, failed to abide by the rules and regulations of the Church of God in Christ by coercing Ms. Pollard and by exploiting his position to continue in an extra-marital affair."

² Emi Music Mexico, S.a. De C.v. V. Rodriguez, 97 S.w.3d 847, 858 (Tex. App. 2003).

³Lee Lewis Constr., Inc. v. Harrison, 70 S.w.3d 778, 782 (Tex.2001); Lermon V. Minyard Food Stores, Inc., No. 05–*13–*00034–*cv, 2014 WL 6466840, at *8 (Tex.app.–*Dallas Nov. 19, 2014, No Pet. H.) (Mem.op.). Lermon, 2014 WL 6466840.

⁴Martinez v. Hays Constr., Inc., 355 S.W.3d 170, 180 (Tex.App.–*Houston [1st dist.] 2011, no pet.).

- 14. In addition to demonstrating the fact that Jones "exploited his position", inherent in the findings and judgment is that Jones' dependent relationship on the church and the board. The conduct and tenor of the procedure evince a relationship that does not comport with assertions of independent agency. Rather, the conduct of the church and the board demonstrate authority of Jones' position.
- 15. Not only did the church and the board hold authority of Jones, they also compensated him.
- 16. COGIC appeared at the deposition of Jones, through counsel, Justin Jeter. See Exhibit E, p. 2.
- 17. During his deposition, Jones testified to the nature of his employment, including pay received, and anticipated, history of advancement, authority delegated to him, authority accountable to, and subjugation to disciplinary action:
 - 5 Q. After you did the freelance, what did you do?
 - 6 A. I started pastoring in October 1995.
 - 7 Q. You started pastoring where at?
 - 8 A. In Albuquerque, New Mexico.
 - 9 Q. How many years did you do that?
 - 10 A. Present.
 - 11 Q. Until the present?
 - 12 A. Yes, sir.
 - Q. Okay. Now, when you started preaching there in
 Albuquerque in '95, did you have a church? Did you have
 any type of
 - 16 A. I was assigned to a church and started
 - 17 I pastoring in '95. I was already in ministry. I was
 - already preaching from '91 to '95. So I was assigned to
 - a church in October 1995.
 - 20 Q. Where was that church located?
 - 21 A. Albuquerque, New Mexico.
 - 22 Q. What was the street address?
 - 23 A. 1120 Second Street Northwest.

24 Q. How long were you at that particular church? 25 A. I am still there. I mean I am still at the⁵ 1 church itself. 2 Q. You are still at that same church? 3 A. No, we are at 4800 Lomas now, so from '95 -- I 4 I mean I was there with the bui 1 ding from '95 until 2013, 5 so from 2013 we have been at 4800 Lomas.6 • • • 10 Q. Now, when you were at the church on Second 11 Street, were you being paid by the church? 12 A. Yes, up until a certain point, until we got 13 ready to purchase a building and move, so probably. 14 whatever my housing was, that is what I was getting paid 15 and, of course, that is still the same -- same 16 stipulation now. Q. So when you were on Second Street, you were 17 18 being paid a housing allowance? 19 A. Yeah, that's it \$2,600 a month. 20 Q. Okay. So you are getting paid \$2,600 a month? 21 A. Yes, sir. 22 Q. How would they pay that to you? Would that be 23 in check? Would that be direct deposit? 24 A. Sometimes it is paid directly to the landlord 25 or sometimes it is it would be direct deposit. I⁷ 1 never received any checks from the church. 2 Q. That was the church paying you every month? 3 What day would they pay that? 4 A. Probably Mondays. 5 Q. Mondays? 6 A. Yes. 7 Q. Did they have like a 15th or 1st? 8 A. Monday every week so -- and if it whatever

⁵Exhibit E, transcript of deposition of James Jones, at page 8.

⁶ld at p.9.

⁷Id at p. 11-12, l. 12.

- 9 day it was for the total collection, it would always be
- on a Monday so.
- 11 Q. So they would pay you out of the collections?
- 12 A. Yes, sir.

...

- 9 Q. And that is what they are still currently
- 10 paying you?
- 11 A. Yes, sir.8
- 18. Oddly, Jones will later testify that he is not currently being paid because COGIC suspended him. More on that, later.
- 19. Jones also held exercised authority of a banking account held in COGIC's name, with Wells Fargo:
 - 11 Q. How many bank accounts do you have?
 - 12 A. A savings and a checking, and I have one
 - business expense account, so I guess maybe three.
 - 14 Q. Who are they with?
 - 15 A. Nusenda Credit Union.
 - 16 Q. Nusenda?
 - 17 A. Nusenda, N-U-S-E-N-D-A.
 - 18 Q. N-U-S --
 - 19 A. - E-N-D-A Credit Union, and the business
 - 20 expense is Wells Fargo.
 - 21 Q. Business is Wells Fargo?
 - 22 A. Yes, sir.9

. . .

- 6 Q. Okay. Now, the Wells Fargo account -
- 7 A. Is just the church business account, and I am
- 8 the only one on that.
- 9 Q. That is just church and business account?
- 10 A. Yes, sir, it is a business expense account so.
- 11 Q. Okay. So how much money is normally in this

⁸Id at p. 13.

⁹ld at p. 14.

```
12
           Wells Fargo account?
13
     A. Usually it is in the negative, so I don't think
14
           there is hardly anything.
15
     Q. Do you have account numbers for these accounts?
16
     A. I do.
17
     Q. Could you give those to me, please?
18
     A. The business and checking -- I mean the
19
           checking and savings is 139 --
20
     Q. 139
21
     A. 1630.
     Q. 1630; is that correct?
22
23
     A. Yes, sir.<sup>10</sup>
. . .
1
     A. Yes, sir, it is. And the Wells Fargo is 853 --
2
     Q. 853 --
3
     A. Yes, sir -- 509 --
4
     Q. 509 --
5
     A. - - 7 821.
6
     Q. --7821.
7
     A. Yes. sir.
8
     Q. Okay. And that's the business account?
9
     A. Business expense account.
10
     Q. Business expense account?
     A. Personal expense, not the business itself.
11
12
     Q. Okay. So you just use that one to pay your
13
           expenses?
14
     A. They use that to pay any stipends that I may
15
           get or offerings or anything, but that is rare, so I
16
           I only use it just for, I guess, maybe as a shield or
17
           something.11
7
     Q. Okay. Now, this savings and checking account,
8
           that is your personal account for you and your wife?
9
     A. Correct.
```

¹⁰ld at p. 15.

¹¹Id at p. 16.

- 10 Q. And is that where your pay gets deposited at,
- 11 your pay from the Church of God in Christ?
- 12 A. Well, usually here lately they pay directly to
- the landlord, which is my rent, so I don't -- there is
- not a deposit normally going to that account at all, so.
- 15 Q. So they just pay your rent?
- 16 A. Yes, sir, I think I said that at the beginning.
- 17 Maybe I didn't make that clear.
- 18 Q. You said they pay your rent?
- 19 A. Yes, sir. 12
- 20. See also, Exhibit C, Wells Fargo bank statement—same account number given by Jones for account held by COGIC.
- 21. Further, Jones' duties including selecting pastors for COGIC.
 - 16 Q. Now, in the Church of God in Christ what is
 - 17 your position?
 - 18 A. I am a jurisdictional bishop.
 - 19 Q. I am sorry. Could you repeat that?
 - 20 A. A jurisdictional bishop.
 - 21 Q. Jurisdictional?
 - 22 A. Yes, bishop.
 - 23 Q. Okay. What does that mean, jurisdictional
 - 24 bishop?
 - 25 A. I have assigned territory in New Mexico 1 jurisdiction.
 - Q. So are you in charge of the whole state of NewI Mexico?
 - 4 A. I am, sir.
 - 5 Q. What are your duties?
 - 6 A. To preside over churches, to appoint pastors,
 - 7 to bury pastors, to administrate conventions.
 - 8 Q. So you appoint pastors?
 - 9 A. I do.
 - 10 Q. So if someone wanted to be a pastor, what must

¹²Id at p. 17.

- 11 they do?
- 12 A. Well, they are going to have to be qualified.
- They would have to go through a background check.
- 14 Q. What do you mean "qualified"?
- 15 A. Well, they would have to be qualified in -- for
- ministry itself, based on probably their training, their experience.
- 18 Q. Okay. Do they need to have like a degree or something?
- 20 A. No, sir.
- 21 Q. Okay. Training and experience, what kind of training do they need?
- 23 A. Pastoral care.
- 24 Q. How do you get that type of training?
- 25 A. Various ones either go to seminary, some of
- Q. Whatever type of reports that you have, do yousend any reports to the home office?
- 23 A. We send financial reports, yes.
- 24 Q. How often do you do that?
- A. Once a year. Well, twice a year. Twice ayear, April, November.
- 18 Q. Okay. And you don't know how the home office raises their money?
- 20 A. I am sure through offerings and from
- 21 conventions, credential reports, I am sure. 13
- 22. According to Jones he, also, used the vehicles of the COGIC for the purposes of his work for COGIC. In short, COGIC controlled tools or instruments of his work.
 - 17 A. I don't lease any vehicles. The church leases
 - 18 a vehicle.
 - 19 Q. Why? Why do they do that?
 - 20 A. Transportation.
 - 21 Q. Who authorizes it?
 - 22 A. The board of trustees.

¹³Id at p. 34-37, I. 1.

- 23 Q. And who uses that vehicle?
- 24 A. Anything that pertains to the church, not just
- 25 any particular -- one particular individual.
- 1 Q. How many vehicles at your church do they lease?
- 2 A. Just one.
- 3 Q. And what kind do they lease?
- 4 A. It is a Lincoln Navigator.
- 5 Q. Do you use it?
- 6 A. I do use it. I drive it.
- 7 Q. Isn't that a benefit?
- 8 A. Not to me, to the church.
- 9 Q. So you get to use it; it is not a benefit to 10 you?
- 11 A. No, it is a benefit to the church.
- 12 Q. And that is the only vehicle that they lease is
- the one, the Lincoln Navigator?
- 14 A. Yes. 14
- 23. Like every other employer-employee relationship, in addition to compensation and controlling the tools, COGIC also had authority to and did in fact discipline Jones.
 - 16 Q. Did the committee actually find that you had
 - 17 broken the rules?
 - 18 A. That is their conclusion.
 - 19 Q. Did you agree with them on any of their points?
 - 20 A. No, I didn't.
 - 21 Q. They did find that you had broken the rules.
 - What sanctions did you get?
 - 23 A. I was suspended for a year.
 - 24 Q. Did you get -- was that without pay?
 - 25 A. That's correct.¹⁵
- 24. Too, COGIC controlled who replaced suspended-Jones, COGIC

¹⁴Id at p. 52-53, I. 14.

¹⁵Id at p. 55.

controlled whether suspended-Jones returned to work, and supervised Jones.

- 1 Q. Did somebody take over your duties?
- 2 A. The church itself.
- Q. Okay. Did they appoint an individual to comeand be bishop over the State of New Mexico?
- 5 A. No, they did not appoint anyone.
- 6 Q. Who took over your duties then?
- 7 A. The church did. Bishop Macklin, he was assigned.¹⁶

...

- 22 Q. Are you guaranteed your job back?
- 23 A. Yes, sir.¹⁷
- 19 Q. And who is directly above you? Who supervises 20 you?
- 21 A. Bishop Blake, the general board. The general board, Bishop Blake.¹⁸
- 17 Q. Well, normally when you get a job people tell 18 you what your job duties are.
- 19 A. Oh, okay. It is in the church, the church 20 manual or church book.
- 21 Q. You have a church book?
- 22 A. I do.
- 23 Q. Where is that today?
- 24 A. Probably in my bookshelf.¹⁹

¹⁶ld at p. 61.

¹⁷Id at p. 65.

¹⁸Id at p. 76.

¹⁹ld at p. 82.

- 25. Based on Pollard's description²⁰ of the relationship and COGIC's findings, Jones patently used his position in the church to gain the trust and confidence of Pollard. As religious figures often do, his opinions and statements about Pollard's maturity were more than ordinary banter between equals. Unlike equals, Jones was clothed by COGIC with indicia of spiritual authority.
- 26. Pollard: "Over the next few months we would talk on a regular basis as he still could not believe that I was only 16, he always pointed out that I was so mature"²¹
- 27. Further, Pollard: "he told me that a sign of maturity was by not asking a lot of questions and just living life. My questions irritated him so at that point, I tried to limit my questions about the whole ordeal because I didn't want him to think that I was immature and could not handle the relationship."
- 28. In addition to describing her reliance on Jones' opinion of her maturity, Pollard's affidavit also describes circumstances that agents of COGIC had actual knowledge of Jones' conduct. Pollard testifies: "He later informed me that the late Bishop W. C. Green Sr. told him that when he traveled, he needed to make sure his wife was with him and for him to not be in hotel rooms with me."
- 29. Jones also used the title of his position in his e-mails with Pollard. See Exhibit H, e-mail from PASTORJLJ@aol.com.
- 30. Pollard's affidavit contemplates Jones' grooming of J.S.: "February 21, 2016 he told me hat he would send my daughter [J.S.], a video message. [J.S.] loved him and had many interactions with him via Glide messaging and over the phone, he was very involved. In the video, he was playing around with her as they always did but then he stopped and then made a very poor judgment in telling her how sexy she looked in her night gown. I responded saying "Sexy? 6?", he

²⁰See Exhibit A, affidavit of Pollard.

²¹ld., p. 1.

didn't respond. Matter of fact, I didn't hear from him for a few days after that and that was not like him at all. I was very uncomfortable with that but was trying to some how make sense of it and down play it but as the days went by, my eyes began to open and I believed that he was trying to groom my daughter just as he had did me when I was 15. I looked back over the years of involvement with my daughter and the way he treated her and interacted with her, she was his biggest fan it only left me to believe that this was all strategically planned by him to violate her in the future."

31. Jones' statement that he would date J.S. is an audio file, at ~1-hour 32-minute mark. File uploaded to PACER. Mp4.

Conclusion & Prayer

- 32. Based on the conduct and testimony of COGIC and Jones, Jones was an employee of COGIC. COGIC admits that Jones used his position to conduct his affairs with plaintiffs. COGIC also had knowledge that Jones was using his position in his relationship with Pollard.
- 33. And, in the context of Jones sexual relationship with Pollard that began when Pollard was a minor, Jones' conduct, messages, and claims regarding J.S. constitute extreme and outrageous conduct.
- 34. Defendant's motion must be denied.

RESPECTFULLY SUBMITTED,

/s/ Levi L. Spriggs TSBN 24046894

EMAIL: LEVI.SPRIGGS@GMAIL.COM

1011 S. JACKSON AMARILLO, TEXAS 79101 Tel.: 806.376.7260

FAX: 806.372.3298

ATTORNEYS FOR PLAINTIFFS

KIMBERLY POLLARD AND J.S., A MINOR CHILD

CERTIFICATE OF SERVICE

On September 15, 2017, a true and correct copy of this document was served on opposing counsel, Justin L. Jeter by e-mail.

On September 16, 2017, a true and correct copy of this document was served on James L'Keith Jones, pro se, to 4800 Lomas NE Albuquerque, NM 87110.

/s/ Levi L. Spriggs

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS AMARILLO DIVISION

KIMBERLY D. POLLARD J.S. (MINOR CHILD)

PLAINTIFFS.

Cause No. 2:16-CV-238-J

٧.

CHURCH OF GOD IN CHRIST, AN

ACTIVE

DOMESTIC TENNESSEE

Nonprofit Corporation; and

CHURCH OF GOD IN CHRIST,

BOARD OF

BISHOPS, AND, BISHOP JAMES

L'KEITH

JONES

DEFENDANTS.

EXHIBITS IN SUPPORT OF PLANITFFS' RESPONSE TO SUMMARY JUDGMENT

Now comes Plaintiffs and in support of their response to summary judgment submit the following:

๛๛๛๛๛๛๛๛๛๛๛๛๛๛๛๛๛๛๛

Exhibit A Affidavit of Kimberly Pollard

Judgment of the Board of Bishops of COGIC, Inc. re Jones Exhibit B

Wells Fargo Bank Statement, produced by James Jones at Exhibit C

deposition

Notice of Deposition Exhibit D

Deposition of James Jones, transcript Exhibit E

Exhibit F Wells Fargo Bank Statement

Affidavit of Kimberly Pollard Exhibit G

RESPECTFULLY SUBMITTED,

/s/ LEVI L. SPRIGGS

TSBN 24046894

EMAIL: <u>LEVI.SPRIGGS@GMAIL.COM</u>

1011 S. Jackson
AMARILLO, TEXAS 79101
TEL.: 806.376.7260
FAX: 806.372.3298
ATTORNEYS FOR PLAINTIFFS
KIMBERLY POLLARD
AND J.S., A MINOR CHILD

CERTIFICATE OF AUTHENTICITY

I certify that the attached exhibits are true and correct copies of the what they purport to be.

/s/ Levi L. Spriggs

CERTIFICATE OF SERVICE

On September 15, 2017, a true and correct copy of this document was served on opposing counsel, Justin L. Jeter by e-mail.

On September 16, 2017, a true and correct copy of this document was served on James L'Keith Jones, pro se, to 4800 Lomas NE Albuquerque, NM 87110.

/s/ Levi L. Spriggs

EXHIBIT A

	AFFIDAVIT
The State of Texas)
) S.S.
County of Lubbock)

I, Kimberly D. Pollard, of Lubbock, Texas, MAKE OATH AND SAY THAT:

- Prelate in 1994, a few months before my 16th birthday (DOB: 1/29/1979). He was 29 (3/20/1965). At that time, I was spending most of my weekends with a "Mother" figure from my church, First Church of God in Christ, Clovis New Mexico. She did PR work for the Jurisdiction, so they communicated frequently. One particular day, I happen to have answered the phone and that's how he and I began communicating. Once I told him how old I was, he couldn't believe it, he stated that he thought that I was at least 23-25 years in age. He made mention of how mature I was for my age that he could not date me until I turned 18, so until then we could only talk on the phone. Over the next few months we would talk on a regular basis as he still could not believe that I was only 16, he always pointed out that I was so mature and pretty to be so young. We'd see each other during district meetings, fellowships or state meetings around the State: Clovis, Roswell, Las Cruces or Hobbs. He'd also go to Clovis (where I resided) for other reasons, not just for district meetings or state meetings, and we'd see each other as well.
- 2. August 1995 during our annual Holy Convocation in Albuquerque NM, he came to the hotel where I was staying, which was the designated hotel for the meeting. My best friend, Dorcas was with me and so he asked us if we wanted to go with him to run errands, we both said yes. He allowed Dorcas to drive his car, it was an Infiniti Q45 (Rental). He said he needed to stop by the Double Tree Hotel to pick up some fruit/gift baskets that were left by delegates (Exhibits 1 and 42) We pulled into the hotel and he got out and went in. When he came back to the car, he was empty handed and he asked me to go in and help him with the baskets, I went in with him. Once in the room, I grabbed a basket and headed towards the door, only to be stopped by him. He said he needed to ask me something. He said someone had told him that I said we had kissed and was that true, did I in fact tell someone we kissed? My reply was no. He then asked, "So if I kiss you now, would you tell anyone?" I told him no. That's when he kissed me, took the basket out of my hand and lead me over to the bed, we had sex.

He ended up preaching that night and afterwards, I asked him how could he just get up and

preach knowing what we just did? In his response, he told me that a sign of maturity was by not asking a lot of questions and just living life (exhibit 43). My questions irritated him so at that point, I tried to limit my questions about the whole ordeal because I didn't want him to think that I was immature and could not handle the relationship.

I ended up disclosing this information to an individual who was 5 years my senior only because she was making fun of the fact that she didn't think he'd ever had sex and was still a virgin. She promised not to tell anyone but after the meeting concluded and we went back home to Clovis, I found out that she had told my "mother" figure. She called me letting me know what she had heard, how disappointed she was because she spoke to Elder Jones and he said he viewed me only as a little sister, since I was Dorcas' best friend. She also said that she would not tell my mother. A week or so later she ended up telling my mother and when my mother brought it up to me, she stated that me that she was going to have him put in jail. As a 16 year old, in love with him, I did lie and say that we were not sleeping together because I didn't want him to go to jail. By doing that, I then had a scarlet letter carved into my head. He was very upset that I opened my mouth and basically told me that if he wasn't saying anything about it, I shouldn't either. After it all calmed down, we continued and he let me know that if I ever chose to speak about it again, he would always have the upper hand.

- 3. My relationship with the "mother" figure wasn't the same after that so I didn't go to her house anymore. I gave him my house number and that's how we continued to talk or I'd call him with a calling card on a payphone while I was at school (exhibit 51:1, 51:2)) He'd call my house and if I didn't answer, he'd hang up. My mother began to become suspicious about all the hang ups and began to question me about the relationship again. It got to the point to where our relationship became strained. I vented to him about it all the time so he came up with the idea to write my mother a letter so that it would possibly make things amicable between us. In this letter, he stated how rumors, gossip, scandals and lies have always made a path to his name. He expressed to her that I was an amazing youth in the NM Jurisdiction and that I had not done anything wrong. He hoped this would clear up any confusion or anything that was being questioned. After the letter, my mother calmed down a bit but only for a little while, he and I continued. When he'd come to Clovis for visits outside of a District/State Meeting, we'd also see each other, I'd go to his room and we would have sexual intercourse.
- 4. July of 1997, he married Rosalind Sanders and I had no prior knowledge of her at all. I found out about the upcoming nuptials via a church announcement. When I confronted him about he said it was something that he "had" to do but that nothing would change. I was confused by that

because for me it would seem that so much would change because he was getting married. After he married, I did not contact him at all, trying to respect his union but at the same time, deal with the hurt and devastation that it caused for me. 5 months later in December, he called saying that he missed me and us along with other things and so I fell right back a relationship with him. He also made it very clear that I could call him anytime and anywhere, even at home, as he paid all the bills and Rosalind did not hinder him from doing anything, ever (Exhibit) 44).

- 5. August 1998, we met up at yet another state meeting, in Hobbs NM. I waited for him to give me the sign the leave the church, as church service was still going on. When he gave the signal, I left. My friend, Steven Mackey agreed to take me to the Allsups Convenience Store on the outskirts of the city to meet him. We pulled up to the store and he was parked there waiting for me. I got into his Mitsubishi Monterro Sport SUV and we left. We drove around the city for while due to not being able to go to a hotel because of the meeting that was taking place. He decided to park on the side of the road on the outskirts of the city and we had sex (Exhibit 2, 45 and 45a) Afterwards, he drove me to my sisters house. He was right, nothing really changed for us after he got married, we continued as before he was married.
- 6. In 1999 during another state meeting, he came to my city (Clovis) alone, as he often would go to the meetings alone then Rosalind would come towards the end of the meeting. I met him at his hotel and he left the door open for me, we had sex. He decided to leave first and told me to wait 10-15 minutes before I left because a lot of people from Jurisdiction were staying at that hotel, I did as he asked, only to be seen by someone. He later informed me that the late Bishop W. C. Green Sr. told him that when he traveled, he needed to make sure his wife was with him and for him to not be in hotel rooms with me.

July 2000, I moved to Texas. He would come to the State meetings in Texas as New Mexico and the Texas Northwest Jurisdiction often supported each other, he would mostly come without Rosalind and we would be together physically and sexually during those times as well. This happened for at least 2 years. Not every encounter was a sexual one, but most of them were. I was finally able to break away from him after that, our communication came to a halt, with phone calls, emails and texts on each other's birthdays or just small talk casual conversation here and there.

7. November 12, 2014 he messaged me letting me know that he was coming to Lubbock because his mother was in the hospital and that he wanted to see me. He was just flying in from the Holy 003

Convocation. Once he checked into the Overton Hotel, I met him there, Room 1306 (Exhibit 47:1-5). It was there that he discussed in detail about his pending divorce and that how I had always managed to bounce back from all that things he has thrown at me and that if it was the other way around, he didn't think that he could do it, as I had. He said that he wanted to pay me back for the past 20 years of bad regarding our relationship and all that I went through because of him. It was in that room where he talked about he had already started planning for his divorce by moving money to different accounts, he had finally paid off his navigator and put it in the Church name and was going to do the same with his next vehicle.

He discussed wanting to make more memories, right memories with me. And that he viewed me and us differently and took it very seriously now. He explained why he had cursed me out whenever I informed him of my pregnancy. He said it was because he was hurt by it. We discussed how we have grown with each other over the 20 years and how we were in a great place at this time in our relationship. After the conversation, we did have sexual intercourse.

8. December 2014 we met up in Clovis, as he was doing some work at my home church, First Church of God in Christ, Wednesday night bible study. I drove from Lubbock and met him at his hotel room 107 at the Hampton Inn for the night (exhibit 48:1, 48:6)). We spent time together, conversed and then we had sexual intercourse on that night. I left the next day after he left. Our schedules began to be a conflict regarding us being able to physically see each other as well as my daughter "needing love". I initially brought up Skype (Exhibit 49:1-49:2) but was then told about a different application called Glide, so I installed that application, on my phone and invited him to do that same. That helped us somewhat because we were able to talk and see each other more frequently.

For my birthdays and for Valentines Day, he'd always send an edible arrangement or flowers (Exhibit 50:1-50:8). He promised he was going to make things right and was going to show me how serious he was about us, so I believed him.

9. We often discussed the changes that would occur regarding his divorce and our union. He thanked me for hanging in there with him and to trust him (Exhibit 51:1-51:2) things were being handled. As we discussed the financial part of his pending divorce, he made mention of a Bishop in AZ that was going through a divorce in which he was using his process as a blueprint for his own divorce from Rosalind. Stated that he had to pay his wife 65K but then his wife took him back to court for a larger amount. Said that he had to present his case to Bishop Blake (Exhibit 51:3-51:5) and he would decide if he could divorce or not but even with that, he could lose the

church and position. He explained to me that it was a long process so during that, we would just plan.

Towards the end of 2015 while he was in Las Vegas, we had an argument about it and I explained to him then that I was tired of waiting and that he was going to go have to do something to really prove to me that he was working on us being together the right way because 20 years was a long time. Again, he said he would prove it to me and so January 2016 he chose to celebrate my birthday with me. We were going to go to Dallas or El Paso Texas because Bishop Watson was having a conference in Lubbock (exhibit 33). Something came up with a church in Hobbs NM so he chose to spend his time in Lubbock with me. He flew in on that Wednesday, January 27th my birthday was on that Friday, January 29th. When he got in on Wednesday night. He gave me jewelry, let me know that it wasn't for my birthday but that was from Christmas (2015). He also said that he had a lot of tricks up his sleeve. He said I would be so happy that I would cry.

We got a room at the Embassy Suites Hotel (exhibit 52:1) and after getting settled in, we had sex several times and he also gave me my birthday gift which was a Samsung Tablet. I already had one so he said he would take it back and get me jewelry. Exhibits numbered 52:2-52:13 are pictures and videos from my birthday celebration.

After my birthday celebration, I was showing him rings for when the time came, he told me that he would buy what's in the budget (Exhibits 53:1-53:3) He informed me that he was looking forward to celebrating Valentines weekend with no details or any pressure. We were not able to see each other physically but he sent me a floral arrangement and as always, he asked to see a picture of my arrangement or anything that he sent me (Exhibit 50:8).

10. On February 21, 2016 he told me that he would send my daughter, (Exhibit 54). Jireh loved him and had many interactions with him via Glide messaging and over the phone, he was very involved. In the video, he was playing around with her as they always did but then he stopped and then made a very poor judgment in telling her how sexy she looked in her night gown. I responded saying, "Sexy? 6?", he didn't respond. Matter of fact, I didn't hear from him for a few days after that and that was not like him at all. I was very uncomfortable with that but was trying to some how make sense of it and down play it but as the days went by, my eyes began to open and I believed that he was trying to groom my daughter just as he had did me when I was 15. I looked back over the years of involvement with my daughter and the way he treated her and interacted with her, she was his biggest fan so it only left me to believe that this was all strategically planned by him to violate her in the future.

In March, I attended a State Meeting in Clovis, we ended up staying in the same hotel unbeknownst to me because in a prior conversation, he mentioned he had reservations at two of the Hotels there in Clovis. I told him where I was staying and that was it. While at the meeting, he told me, his words, "I am not going to bring any attention to you, I am not going to tolerate anyone looking at you bad because of me. I hope you catch my drift. I believe I trust you more than you know, I pray that it never gets violated, because I'm going to do all I can to keep what we have sealed and between us". After this meeting ended, it was brought to my attention that he was saying that I was his stalker, that I was toxic, unstable and crazy. I was extremely hurt by it and felt that he was only putting that out there in an attempt to try to cover the relationship. I questioned him about it and at first he proceeded to say that he never said it, nor would ever have a reason to say it because of the relationship. After going back and forth as to him saying he never said it to maybe he said it, then to if he said it, he only said it because he was under so much pressure and so on. He knew that I was very upset and so he resorted to his number one fallback which was asking for prayer. That was one of his ways of always reeling me back in. "Pray for me", "You're the only person I trust", "I'm going through so much right now" "I'm always being attacked," "We are prayer partners, we pray for each other". He knew that I would never say no to praying with him or for him.

The additional exhibits 55-66 are from just some of the interactions between him, myself and Jireh. I believe it will offer more support in showing the true nature of our relationship, the comfort level, trust and familiarity between all parties.

SUBSCRIBED AND SWORN TO

BEFORE ME, on the

25th day of July, 2016

BRENDA RODRIGUEZ

Notary Public, State of Texas

Comm. Expires 05-30-2018

Notary ID 12826199-5

NOTARY PUBLIC

My Commission expires: 5/30/2018

)

Kimberly D. Pollard

BEFORE THE BOARD OF BISHOPS CHURCH OF GOD IN CHRIST, INC. CHAIRMAN, BISHOP JOHN H. SHEARD



IN RE BISHOP JAMES L'KEITH JONES

STATEMENT OF ALLEGED VIOLATION

- 1. On or about May 8, 2016, Kimberly D. Pollard wrote a letter to Bishop John H. Sheard, Chairman of the Board of Bishops, Bishop Joel H. Lyle, Jr., General Secretary of the Church of God, and several others enclosing her complaint against Bishop James. L'Keith Jones, Jurisdictional Prelate of the New Mexico Jurisdiction (the "Complaint").
- 2. In her Complaint, she alleges that Bishop Jones violated "the statutes of the Bible, the rules and regulations of the Official Manual of The [sic] Church of God in Christ, Inc." The Complaint contained several attachments, including but not limited to, screen shots of text messages purportedly between Ms. Pollard and Bishop Jones, and two frontal pictures of a nude African-American male.
- 3. The Complaint sets forth four counts against Bishop Jones. First, Ms. Pollard contends that Bishop Jones failed to abide by the rules and regulations of the Church of God in Christ in violation of Article VIII, §D, ¶1(a) failure to abide by the rules of the Church. Specifically, she asserts that Bishop Jones failed to adhere to the dictates of the Church of God in Christ Sexual Misconduct Policy, which provides that members of the Board of Bishops cannot engage in sexual misconduct of any kind.
- 4. Second, Ms. Pollard makes a separate claim under the same provision of the COGIC Constitution, Article VIII, §D, ¶1(a), alleging that Bishop Jones coerced her into participating in "extra martial acts" with him. She also alleges that he exploited her by using his ministerial position to convince her to enter into and to continue the relationship. She claims that the coercion and the exploitation are both violations of the rules of the Church.
- 5. Third, Ms. Pollard alleges that Bishop Jones breached the COGIC Constitution by using his position of authority to engage in sexual acts with her as a minor, and then using his position of authority to coerce her into the continuation of this acts after he was married. Both actions, she contends, violate Article VIII, §D, ¶1(b) misfeasance, malfeasance, or nonfeasance in office.
- 6. Finally, Ms. Pollard alleges that because she and Bishop Jones had sexual intercourse, that she and Bishop Jones committed adultery. Ms. Pollard defines adultery as voluntary sexual intercourse of a married person with a person other than the offender's husband or wife. Ms. Pollard contends that she was never married to Bishop Jones. She contends that they had sexual intercourse. Ms. Pollard contends that the adultery was on a continuous basis during his marriage. She also contends that the act of adultery directly violates the commandments of the Bible, and "makes [him] unfit to Shepard the people of God." She claims that adultery constitutes conduct unbecoming a Bishop, in violation of Article VIII, §D, ¶1(h).

- 7. The Complaint was signed and notarized by Ms. Pollard.
- 8. On or about May 23, 2016, Bishop Larry Shaw, Secretary of the Board of Bishops, acknowledged receipt of the Complaint and the Complaint was officially forwarded to the Grievance Committee.
- 9. On or about May 24, 2016, Bishop Roy Dixon, Chairman of the Grievance Committee, contacted both parties and acknowledged receipt of the Complaint. In this communication, he informed Bishop Jones that he had the opportunity to provide a written statement responding to the Complaint and requested that the statement be submitted no later than June 23, 2016.
- 10. As a part of the investigation, on or about May 28, 2016, Bishop Dixon wrote Bishop Jones and attached a copy of Exhibit B of the Complaint and requested that Bishop Jones "confirm or deny that the person in [the] image" was him.
- 11. On or about May 29, 2016, Ms. Pollard provided to the Grievance Committee a series of videos some of which were created on the "Glide" platform. She also produced additional photographs. Ms. Pollard claimed that all of these items supported her claim that she and Bishop Jones were engaged in a sexual relationship. All of these items were forwarded to Bishop Jones and his counsel.
- 12. On or about June 8, 2016, Bishop Jones filed a Motion for a Bill of Particulars. He argued that the details of the Complaint were "extremely vague" and thus, he could not give a reasonable response. The items about which he was concerned were that the Complaint contained unknown places of stated events; that the facts regarding certain conversations were overly general and ambiguous; and that there was a lack of timeframes and/or dates in the Complaint.
- 13. On June 10, 2016, Bishop Jones' Motion for a Bill of Particulars was denied as premature. Under the Rules of Trial Procedure, a Motion for a Bill of Particulars would only be proper following the investigation by the Grievance Committee, and only after the Grievance Committee has issued a Statement of Alleged Violation. A Motion of this type cannot thwart the work of the Grievance Committee.
- 14. The Board of Bishops adheres to the notice pleading concepts as most members of the Church are not experienced legal practitioners. The duty of the Grievance Committee is to ascertain the detailed facts through the investigatory process. The Complaint and attachments provided Bishop Jones sufficient notice of the nature of Ms. Pollard's allegations. At that point, the Grievance Committee had not issued a Statement of Alleged Violations because it was engaged in its investigatory process. Moreover, under the Rules of Trial Procedure adopted by the Board of Bishops in April 2016, Rule No. 8 no longer has a provision for a Bill of Particulars.
- 15. Thus, on or about June 27, 2016 Bishop Jones submitted his response to the Complaint. He argued that the Complaint contained innuendo, speculative assertions, and lacked specific events and details that are necessary to support her allegations. He also argued that the Board could only consider the Complaint if the alleged violation occurred within the previous 10

(V concersion of BOB in response to hospondants motor for the of

1115 V Respondent foled an unaffected to formal perpose

nod motion for Indetwo order

Respondent never thed a hound worther response of made henself sussinble

?

years or if the Complaint alleges that Respondent engaged in behavior to cover up or hide the violation.

- 16. Bishop Jones argued in part that Counts I, II, III and IV should be dismissed because the actions alleged occurred in a time period greater than 10 years before the Complaint was filed.
- 17. He argues that in Ms. Pollard's Statement of Facts, all that she asserts is "that 'in 2014 [they] reconnected sexually'." Bishop Jones contends that this allegation does not provide any specific instances of sexual misconduct, sexual harassment, sexual intercourse or other sexual contact that would constitute a violation of the governing regulations of the Church.
- 18. In his response, Bishop Jones challenges Ms. Pollard's contention that he made an inappropriate statement to her daughter in a video message. He concedes that he made the video statement and that it might have been in "bad taste" but he challenges the notion that the video message to Ms. Pollard and her daughter rose to a level of sexual misconduct, malfeasance, or conduct unbecoming a Bishop.
- 19. Bishop Jones further contends that "the several videos and few photos provided by Ms. Pollard" lack time stamps "which could be used to identify any of the occurrences with specificity." He then goes on the offensive and asserts that the only thing that the videos prove is that Ms. Pollard "violated Bishop Jones privacy rights on multiple occasions by filming him without his permission". He argues further that there is no way to establish that it was Ms. Pollard taking the video and that the video of the naked man are blurred "beyond recognition."
- 20. He denies that Ms. Pollard would have had the opportunity to take such a photo, and then denies that the photo is of him. He says that the Complaint lacks the notary language required by the Rules of Trial Procedure and therefore the Complaint should not be considered.
- 21. On or about July 11, 2016, the Grievance Committee by and through its counsel requested through Bishop Jones counsel, Ahmad Assed, that Mr. Jones be made available for an interview by the Grievance Committee on this matter. Mr. Assed was assured that the meeting would be an interview and not an ambush.
- 22. On July 11, 2016, Mr. Assed responded that it was Bishop Jones' position that his "June 27, 2016 informal response to Ms. Pollard's allegations was clearly written and contain[ed] all of the information Mr. Jones [would] be offering in this matter." Mr. Assed then went on to inquire "as to any incentive being offered to Mr. Jones for interviewing with the Board." He claimed to not see any benefit to submitting to the interview.
- 23. On or about July 14, 2016, Bishop Jones' counsel wrote the Grievance Committee again and complained about the about distribution of some of the photos via VoIP and from the Twillo provider throughout the brotherhood.
- 24. On that same day, counsel for the Grievance Committee responded to Mr. Assed and informed him that the Board of Bishops had no knowledge of the distribution of the information, and that no member of the Grievance Committee had distributed the information or

was responsible for the distribution by others. He informed Mr. Assed that in all likelihood this information was being distributed by the Complainant and that the Rules of Trial Procedure only applied to the Board of Bishops and that we had no direct control over her in that regard – particularly since there was no Confidentiality Agreement or Protective Order in this case or any other case.

- 25. In this same communication, Counsel for the Board of Bishops again requested on behalf of the Grievance Committee an opportunity to interview Bishop Jones.
- 26. On July 18, 2016, Bishop Jones' counsel seemed to indicate that Bishop Jones finally would be willing to submit to an interview. However, his counsel wanted to know exactly who would be interviewing him, the nature of the questions being asked, and whether the interview would be recorded.
- 27. On July 19, 2016, the Grievance Committee by and through counsel responded in the following manner:

"[T]he Grievance Committee appreciates your client's change of heart and willingness to participate in an interview so that the Grievance Committee can complete its duty to determine whether there is just cause to proceed with a trial or make some other recommendation to the Board of Bishops. As a lawyer, I am sure you desire certainty. However, in terms of the attendance at the interview, we cannot give you the kind of certainty that you are likely looking for. It's a very fluid process. I have already told you that the interview is likely to be conducted by Bishop Roy Dixon (Chair) and Bishop Roger Jones (Vice Chair). However, other members of the Grievance Committee could attend - depending on the schedule etc. I will also likely be there. You want to know about the nature of the questions? The questions will relate to the content of the complaint, the exhibits attached to the complaint, the subsequent videos provided by the complainant, and any other relevant matter that would help the Grievance Committee determine whether there is just cause to trial. The rules provide, however, that if anything else comes up in the course of the investigation, the Grievance Committee would have to seek permission from the Board of Bishops to broaden the scope. I only mention that so that your client has some assurance that there are limits to the scope of the discussion.

Your client could help the Grievance Committee by taking the exhibits and videos that the Complainant has provided us and informing the Grievance Committee whether he agrees or disagrees that: a) the videos, text or other electronic communications were sent by him; b) the images in the pictures and or video are him; and 3) if the answer to 1 or 2 [are] yes, were they recorded in the last 10 years. If the answer to questions 1 and 2 are "no" — that these images are not him, or if he didn't send the text messages, have him explain in writing, if he knows, his theory on how Complainant obtained these images. The answer to these questions, would aid the Grievance Committee a great deal.

We cannot commit to not recording the interview. It is not the plan to do so at this time. Of course, if that changes, we will let you know. Interviews conducted by the Grievance Committee are not a deposition and are not typically under oath. Do you think that it

should be? The typical nature of these interviews is that it is cast as a discussion between colleagues amongst the Board of Bishops. And those colleagues will share with the other members of the Grievance Committee what they learned during the interview. The expectation is that your client would be truthful, and that there would be no need to place him under oath. However, in the past and on occasion, the Grievance Committee has asked for declarations or admissions after the interview to aid it in its process of bringing these matters to conclusion."



- 28. The requested interview was never scheduled.
- 29. On July 20, 2016, Bishop Jones filed a motion for a protective order.
- 30. On or about July 25, 2016, Ms. Pollard submitted a detailed affidavit to the Grievance Committee providing dates and times of specific events referenced in the Complaint and additional videos and photographs of herself and an African-American male whom she identifies to be Bishop James L. Keith Jones.
- 31. On August 10, 2016, Ms. Pollard's counsel responded to the Motion for a Protective Order. Mr. McDonald explained that he was unware of a court filing regarding a Protective Order. He suggests that he is not bound by the Board of Bishop's Rules of Trial Procedure.¹
- 32. The Grievance Committee, pursuant to Rule of Trial Procedure No. 6, has considered the evidence before it, has determined by a majority of its members present and voting that there is just cause to believe that Bishop James L'Keith Jones violated the Official Manual, or law, rule, regulation or other standard of conduct applicable to the performance of the official duties or the discharge of official responsibilities of a member of the Board of Bishops. It is difficult to imagine a circumstance more appropriate for trial where there is competing assessments of video, e-mails and text messages. The only appropriate action is for the Board of Bishops at large to determine the authenticity, truthfulness, legitimacy of the statements, documents, photos and video and conclude whether they are consistent with the allegations advanced by the Complainant. In particular the violations are as follows:



COUNT ONE FAILURE TO ABIDE BY THE RULES AND REGULATIONS OF THE COGIC (Article VIII, Section D, ¶1(a))

- 33. The Grievance Committee incorporates by reference the preceding paragraphs 1-32 into this Count I.
- 34. Ms. Pollard alleges that she and Bishop Jones have been involved in a sexual relationship on and off basis since she was 16 years old approximately 20 years. In this

¹ While the Board of Bishops has not yet ruled on the Motion for a Protective Order, Ms. Pollard has availed herself of the Church of God in Christ ecclesiastical adjudicatory process by filing a Complaint with the Church. If she or her counsel does not desire to adhere to the rules and procedures of this Church, she is free to withdraw her claim. But to the extent that she desires to avail herself of the church process, she will be compelled to abide by the church's rules.

connection, she contends that he used his position of authority to exploit her and to coerce her to submit to an illicit and immoral relationship.

- 35. Ms. Pollard provides the details of the relationship in both her Complaint and in her affidavit regarding the alleged sexual relationship. For example,
 - a. Ms. Pollard states the she was 15 when they met and that she was 16 when they had their first sexual encounter in Albuquerque, NM in August 1995. See Complaint, pg. 2; see also Pollard Aff., ¶1-2.
 - b. Ms. Pollard states that they had sex again in 1998 in Hobbs, NM. See Pollard Aff.,¶5. She even identified the vehicle where they had sex – Mitsubishi Montero SUV. Id.
 - c. She attaches to her Affidavit as Exhibit 45A a copy of a 2014 text message allegedly between she and Bishop Jones where it appears that they were discussing the 1998 sexual encounter in detail. The discussion includes lewd details of the alleged sexual encounter. This text message shown on Exhibit 45A is between Ms. Pollard and a phone number (505) 453-1118. This same phone number is listed in the Board of Bishops records as belonging to Bishop Jones.
 - d. Ms. Pollard alleges in the Complaint that in 2014, she and Bishop Jones "reconnected sexually". In her affidavit, she describes in detail how they reconnected. See Pollard Aff., ¶7. She provides the time frame -- November 2014. Id. She provides the location -- Overton Hotel, Room 1306. Id.
 - e. She says that in December 2014 she and Bishop Jones met in Clovis, NM and had sex in a Hampton Inn, Room 107. See Pollard Aff. ¶8. She submits exhibits 48:1-4 (text messages allegedly between Ms. Pollard and someone at (505) 453-1118) to support the proposition that she was with him that evening. Id.
 - f. She also attaches two videos to her affidavit Exhibits 48:5 and 48:6 which shows an African-American male that has a strong resemblance to Bishop Jones exiting a bathroom in what appears to be a hotel room. There are two voices in the first video one of a female and the man speaking sounds like Bishop Jones. See Exhibit 48:5².
 - g. In the second video documenting the Clovis, NM encounter Exhibit 48:6 Ms. Pollard records items that are in the closet in the hotel room. In this video, she shows her face. The clothing items she shows are clearly belongs to a male. She records the shoes and boots, the brands Ecco and Johnston & Murphy; she documents the shoe size size 12. She goes

² At one point in the video attached as Exhibit 48:5, the parties in the video discuss a child named Jireh. According to the Complaint, Jireh is the name of Ms. Pollard's daughter.

- through the luggage of the individual and records some of the items that are in the luggage: a black Kangol baseball hat; a paisley tie; a male virility supplement; condoms Trojan Enz, and a gold cross commonly worn by Bishops in this Church.
- h. Significantly, the most recent sexual encounter occurred January 27, 2016 when Bishop Jones travelled to Lubbock, TX and met Ms. Pollard at the Embassy Suites for her birthday. She claims they had "sex several times." See Pollard Aff., ¶9. Ms. Pollard states in her Affidavit that Bishop gave her a Samsung Tablet as a birthday gift. Id. She supports this allegation with text messages to and from the phone number (505) 453-1118. Exhibit 52:3 is particularly interesting because it shows an African-American male in the background that appears to be Bishop Jones standing in what appears to be a hotel room with Ms. Pollard. Exhibits 52:4-7 are much clearer and are pictures of Ms. Pollard and a man that appears to be Bishop Jones. Exhibits 53:1-53:3 are additional photos produced by Ms. Pollard which are text messages between Ms. Pollard and someone at (505) 453-1118, where she models a necklace that the person at (505) 453-1118 allegedly purchased for her and the person responds via text message "Looks great" and "I miss you too, Kim."
- i. Another video recorded during the same encounter, Exhibit 52:12, is a recordation of a naked African-American male coming out of a shower wrapped in a towel in what appears to be a hotel room. The man appears to be Bishop Jones. The voice in the video seems to match the voice in Exhibit 48:6 where Ms. Pollard identifies herself.
- j. She provides multiple Glide videos of an African-American male who she claims is Bishop Jones making lude sexual gestures. The person in the Glide videos is an African-American male which bears a strong resemblance to Bishop Jones. One of the videos that was sent to Ms. Pollard was apparently recorded while a man that resembles Bishop Jones was sitting in the chambers of the Board of Bishops. We know that it is in the chambers because the man that appears to be Bishop Jones says to the camera "long conference" and in the background is the voice of Bishop John H. Sheard. We know that it is Bishop Sheard speaking because he references Bishop Harvey Lewis, the Chaplin of the Board of Bishops and Bishop Sheard refers to another Bishop as "his friend for real", which is an idiom or expression of endearment that Bishop Sheard uses frequently.
- 36. The most compelling piece of evidence in terms of just cause determination is a 13-second video clip submitted by Ms. Pollard where there are two voices (male and female) and a picture of a nude African-American male getting into a bed. She claims that the individuals in the video are she and Bishop Jones. While he says that the video is blurry, the male in the video at least bears a strong resemblance to Bishop Jones, and the voice seems to be his. This video was provided to the Grievance Committee by Ms. Pollard on May 29, 2016.

- 37. In support of her claim, Ms. Pollard cites to the Rules of Operation of the Board of Bishops which provides that "the Board of Bishops expects the highest biblically based moral behavior of all its members". She also references the Sexual Misconduct Policy of the Church of God in Christ.
- 38. Bishop Jones argues that actions taken more than 10 years ago should not be considered by the Board of Bishops. Bishop Jones misreads the Rules of Trial Procedure. Rule of Trial Procedure 3(g)(2) provides that the Board of Bishops can consider "matters of sexual misconduct set forth in the Sexual Misconduct Policy Handbook promulgated by the Office of General Counsel of the Church of God in Christ" if the "alleged violations occurred within the previous ten (10) years". Ms. Pollard alleges that she and Bishop Jones had sexual intercourse in 2014, 2015 and 2016. She not only alleges such, she provides dates, hotel rooms and other details that would warrant full consideration by the Board of Bishops. The factual information that she provides prior to that time period is not the sole basis of the decision of the Board of Bishops, and only provides context for her claims.
- 39. Bishop Jones denies these actions, but the evidence provided by Ms. Pollard is sufficient to warrant a trial on these issues. The Grievance Committee is left with no choice but to submit this matter whether Bishops Jones' alleged actions violate the rules and regulations of the Church to the Board of Bishops for trial because among other things, it appears that the pictures of the nude man in bed with Complainant are pictures of Bishop Jones, and without evidence to the contrary and without a full explanation from Bishop Jones a trial is the only alternative.
- 40. WHEREFORE, the Grievance Committee finds that there is just cause to believe that Bishop James L'Keith Jones, Jurisdictional Prelate of the New Mexico Jurisdiction has violated Article VIII, §D, ¶1(a) of the COGIC Constitution by engaging in sexual acts with Ms. Kimberly Pollard to whom he is not now nor has ever been married.





COUNT TWO FAILURE TO ABIDE BY THE RULES AND REGULATIONS OF THE COGIC (Article VIII, Section D, ¶1(a))

- 41. The Grievance Committee incorporates by reference the preceding paragraphs 1 through 40 into this Count II.
- 42. Ms. Pollard alleges that Bishop Jones coerced her into participating in the extra marital acts of Bishop Jones. She also claims that he exploited her. She cites to the 2009 Sexual Misconduct Policy Handbook of the Church of God in Christ as a basis for her claim that the alleged coercion and exploitation was a violation of the Church's rules and regulations.
- 43. She contends that his actions violate the rules and regulations of the Church i.e., prohibition against sexual abuse and sexual harassment; sexual abuse within the ministerial relationship involves the betrayal of sacred trust, a violation of the ministerial role and exploitation of those who are vulnerable; exploitation of a power relationship rather than as an exclusively sexual issue.

- 44. Bishop Jones' only defense to Count II is that Ms. Pollard only cites to "a single relevant event allegedly occurring within the past 10 years, in which [she] claims that the Respondent coerced her into participating in the extra marital acts of the Respondent."
- 45. He goes on to say that Ms. Pollard fails to specify any sort of specific times, dates, locations or specific conduct that would be necessary to support those allegations.
- 46. The Grievance Committee agrees that Ms. Pollard's initial complaint failed to clearly articulate her claim. But she did provide the basic nuts and bolts to ferret out the meaning of her charge. It is abundantly clear from the four corners of the Complaint and from her supporting affidavit that she believes that Bishop Jones initially used his position as a minister and then later as a Bishop to coerce her into an extra-marital relationship and then continue that relationship into the recent past using those same tactics.
- 47. It must be stated that the Grievance Committee is not oblivious to the fact that Ms. Pollard shares some culpability. However, the rules of the Board of Bishops and the COGIC Constitution is only concerned with policing the behavior of COGIC's leadership notwithstanding the culpability of Ms. Pollard, as Bishop Jones' paramour. Righteous living requires discipline and self-control.
- 48. The Grievance Committee rejects Bishop Jones' defense for two reasons. First, in her detailed affidavit Ms. Pollard provides a plethora of specific examples of times, dates and activities so support her claim. In addition to the examples set forth in the paragraphs above, she presents to the Board of Bishops copies of text messages wherein Bishop Jones and she are discussing his planned divorce from his current wife and his plans to marry Ms. Pollard. See Complaint, Exhibit 18. What can be more classic in terms of coercion than the man promising the "other woman" that he's going to leave his wife for her? To the extent that the Prosecuting Authority is able to establish that the text messages are actually from Bishop Jones, there is ample evidence to establish coercion.
- 49. In addition, Ms. Pollard produces pictures of flowers and gifts that he gave her over the past few years. Giving gifts of this type to a vulnerable single woman is arguably coercive behavior.
- 50. Finally, Ms. Pollard produces text messages allegedly from Bishop Jones showing that he requested that she "pray" for him. It appears as if he used all of the classic COGIC language and symbols to gain her attention and garner her favor. Using the aura of his office to maintain his relationship with Ms. Pollard could arguably constitute exploitation of the COGIC culture, belief system, and his position. He allegedly met her at COGIC meetings and conferences. He allegedly called her out of service to meet her at some pre-determined rendezvous. Of course, the question of trial is whether the videos which purport to be of Bishop Jones, the text messages which purport to be to and from Bishop Jones can be authenticated and whether certain items in the video actually belong to Bishop Jones. The answer to all of these questions, of course, is for a jury to determine. The Grievance Committee alone cannot determine guilt unequivocally, but there is certainly just cause to believe that Bishop Jones violated COGIC's rules in this regard. The final determination will have to be made by the Board of Bishops at large.



WHEREFORE, the Grievance Committee finds there is just cause to believe that Bishop James L'Keith Jones, Jurisdictional Prelate of the New Mexico Jurisdiction, failed to abide by the rules and regulations of the Church of God in Christ by coercing Ms. Pollard and by exploiting his position to continue in an extra-marital affair.





COUNT THREE MISFESANCE, MALFEASANCE, OR NONFEASANCE IN OFFICE (Article VIII, Section D, ¶1(b))

- 51. The Grievance Committee incorporates by reference into this Count III the preceding paragraphs 1 through 50.
- 52. In Count III, Ms. Pollard alleges that Bishop Jones engaged in "misfeasance, malfeasance, or nonfeasance in office". She then sets forth the definition of Malfeasance from Black's Law Dictionary, and the definition of Statutory Rape from the same source.
- Ms. Pollard's Count III lacks precise detail and explanation as to what she is alleging. But she does state in her statement of facts that she met Bishop Jones when she was 15 and Bishop Jones was 29. In her affidavit, she states that she met Bishop Jones in 1994, and provides her birthdate and the Bishop Jones' birthdate to confirm their ages at the time.
- Ms. Pollard asserts that she was unable to give consent to sexual intercourse while she was a minor. So at least one aspect of her Count III is her claim that Bishop Jones committed statutory rape.
- Ms. Pollard alleges in the Complaint that in August 1995 that their relationship turned sexual and that they had sex during the Holy Convocation in 1995 in Albuquerque, NM. She does not allege that he was a Bishop at that time.
- After they had sex, she states in her affidavit that Bishop Jones told her, as a 16 56. year old girl, that a sign of maturity was to live life and not to ask a lot of questions.
- Bishop Jones' only response to Count III is that the allegations are over 10 years old and therefore should be disregarded. He provides no other response.
- Ms. Pollard, however, also alleges that after she became an adult, Bishop Jones "used his position of authority to coerce the continuation of these unlawful acts". She is apparently referring to the unlawful act of statutory rape. She is not clear.
- The Grievance Committee finds that Ms. Pollard does not adequately state a claim that Bishop Jones engage in "misfeasance, malfeasance, or nonfeasance in office". First, obviously, at the time of the alleged facts, Bishop Jones did not hold the office of a Bishop. Thus, none of his acts at that time were while he was "in office." Second, in New Mexico the age of consent is 16. New Mexico Code 30-9-11(F) -- rape of a minor by penetration. She concedes that she was 16 at the time of their first sexual encounter. Thus, he did not commit statutory rape.

60. It is worth noting, however, that had Ms. Pollard been less than 16 at the time of the first sexual encounter, and since Bishop Jones was over 18 at the time and at least 4 years older than Ms. Pollard, his actions would have clearly constituted statutory rape in the State of New Mexico. The only question remaining then would be whether his actions afterwards could be construed as "behavior to cover up the violation" such that the 10 year statute of limitations under the Board of Bishops Rules of Trial Procedure would have been tolled. Fortunately for Bishop Jones, since there was no statutory rape, statute of limitations is not an issue.

WHEREFORE, the Grievance Committee does not find there is just cause to believe that Bishop James L'Keith Jones, Jurisdictional Prelate of New Mexico Jurisdiction, violated Article VIII, §D, ¶ 1(b), by committing misfeasance, malfeasance or nonfeasance in office.

COUNT FOUR CONDUCT UNBECOMING A BISHOP (Article VIII, Section D, ¶1(h))

- 61. The Grievance Committee incorporates by reference into this Count IV the preceding paragraphs 1 through 60.
- 62. Ms. Pollard alleges that Bishop Jones engaged in conduct unbecoming a Bishop in violation of Article VIII, §D, ¶1(h) of the COGIC Constitution. She defines adultery to be "voluntary sexual intercourse of a married person with a person other than the offender's husband or wife." She alleges that his acts of adultery constituted conduct unbecoming a Bishop. It is without question that adultery is biblically prohibited and fidelity is one of the enumerated standards for the office of a Bishop. See 1 Timothy 3:2, 12; Titus 1:6.
- 63. Bishop Jones responds that the acts about which Ms. Pollard complains are barred by the applicable statute of limitations. He makes no other response.
- 64. The Grievance Committee disagrees. The argument that her claims are barred by the statute of limitations is simply meritless and almost insulting. Ms. Pollard declares in her affidavit that she and Bishop Jones had sexual intercourse THIS YEAR. January 2016 is within the actionable time period. She has clearly met that statute of limitations hurdle.
- 65. Given all of Ms. Pollard's allegations, there is no question that there is just cause to believe that Bishop Jones engaged in conduct unbecoming a Bishop. In addition to the aforementioned facts, Ms. Pollard provides copies of text messages allegedly attributable to him where he uses foul language. See Pollard Aff., Exs 50:3-50:4. She attaches copies of Glide videos where an African-American man, which appears to be Bishop Jones, makes lude sexual gestures clearly suggesting sexual acts that he would perform with or on Ms. Pollard. If anything is unbecoming, certainly a Bishop of the Church of God in Christ sending sexually explicit videos to a woman to whom he is not married would be unbecoming.

³ Ms. Pollard produced a text message showing that Bishop Jones actively engaged and made decisions to cover up their relationship. *See* Pollard Aff., Ex. 33 (Bishop Jones seeks to avoid Lubbock, Texas in January 2016 as a place for a secret rendezvous because he was aware of a jurisdictional conference at that time.

- 66. Bishop Jones concedes in his response to the Complaint that making a statement to Ms. Pollard's daughter was in bad taste. Arguably that statement could also be construed as conduct unbecoming of a Bishop. Only the Board of Bishops at large can decide.
- 67. In short, there is an avalanche of evidence suggesting conduct unbecoming of a Bishop.
- 68. Given the detailed affidavit, the videos, pictures, and text messages, the Grievance Committee has no choice but to submit this matter to the Board of Bishops at large for trial.

WHEREFORE, the Grievance Committee finds that there is just cause to believe that Bishop James L'Keith Jones, Jurisdictional Prelate of New Mexico Jurisdiction, has violated Article VIII, §D, ¶I(h) of the COGIC Constitution, conduct unbecoming a Bishop, by and because of his sexual and illicit relationship with Kimberly D. Pollard.

Respectfully Submitted,

Bishop Roy Dixon Committee Chairman

Dated: September 18, 2016

- ford osoloteons in 3 out of of counts

- ford osoloteons in 3 out of of counts

- ford osoloteons in 3 out of of counts

- ford osoloteons in 3 out of of counts

- ford osoloteons in 3 out of of a motion to draws and

- ford osoloteons ford did not fice a motion to draws. I see

It can only be assumed your your fire BOB acted on is sure. I see

It can only be assumed your your in in cocite's Truck procedure

NO provession for this section in in cocite's Truck processes of

Autocate processes of

Case 2:16-cv-00238-D Document 53-1 Filed 09/15/17 Page 24 of 138 PageID 428

Wells Fargo Simple Business Checking

Account number: 8535097821 ■ June 7, 2017 - July 7, 2017 ■ Page 1 of 5





CHURCH OF GOD IN CHRIST INC PO BOX 30104 ALBUQUERQUE NM 87190-0104

Questions?

Available by phone 24 hours a day, 7 days a week: Telecommunications Relay Services calls accepted

1-800-CALL-WELLS (1-800-225-5935)

TTY: 1-800-877-4833 En español: 1-877-337-7454

Online: wellsfargo.com/biz

Write: Wells Fargo Bank, N.A. (585)

P.O. Box 6995

Portland, OR 97228-6995

Your Business and Wells Fargo

Cash flow is a key indicator of the financial health of your business. Find tips and strategies for effective cash flow management at wellsfargoworks.com.

Account options

A check mark in the box indicates you have these convenient services with your account(s). Go to wellsfargo.com/biz or call the number above if you have questions or if you would like to add new services.

Business Online Banking	1
Online Statements	1
Business Bill Pay	1
Business Spending Report	1
Overdraft Protection	_

Activity summary	
Beginning balance on 6/7	\$48.83
Deposits/Credits	4,871.00
Withdrawals/Debits	- 3,940.43
Ending balance on 7/7	\$979.40
Average ledger balance this period	\$492.00

Account number: 8535097821
CHURCH OF GOD IN CHRIST INC

New Mexico account terms and conditions apply

For Direct Deposit use

Routing Number (RTN): 107002192

For Wire Transfers use

Routing Number (RTN): 121000248

Overdraft Protection

This account is not currently covered by Overdraft Protection. If you would like more information regarding Overdraft Protection and eligibility requirements please call the number listed on your statement or visit your Wells Fargo store.

Case 2:16-cv-00238-D Document 53-1 Filed 09/15/17 Page 26 of 138 PageID 430



Levi Spriggs < levi.spriggs@gmail.com >

Fwd: Re: Pollard v. Church of God in Christ--Deposition

1 message

Warren McDonald

Warren McDonald
Wmcdonald.lawofficesofigm@gmail.com>

To: Losi Springs
Closi oprings @gmail.com>

Fri, Sep 15, 2017 at 11:44 AM

To: Levi Spriggs < levi.spriggs@gmail.com>

----- Forwarded message ------

From: "Warren McDonald" <wmcdonald.lawofficesofjgm@gmail.com>

Date: Aug 11, 2017 7:39 PM

Subject: Re: Pollard v. Church of God in Christ--Deposition

To: "James Jones" < ilkjones@me.com>

Cc:

Mr. Jones,

We are requesting that you make yourself available on August 30th, 2017, at 1401 Crickets ave in Lubbock, Texas at 10 am to be deposed. Please bring documents and be prepared to discuss your financial status, including: the last 3 years state and federal tax returns for you and your wife Rosalyn Jones; documents relating to any real property in the name of you and your wife Rosalyn Jones; any leases for any real property in the last 5 years for you and your wife Rosalyn Jones; any and all bank accounts listed in any state in the United States under your name or your wife Rosalyn Jones' name or any account that either of you are on a signature card for; be prepared to discuss any involvement of an inappropriate nature between you and Bishop Charles E. Blake; be prepared to discuss your involvement with and knowledge of a man who goes by the name of Shawn Butts; please bring all documents concerning your child support obligations to your child Bynae Coleman, including all amounts in which you are in arrears and all child support orders from 1996 until current; be prepared to discuss your knowledge of the so called "Upper Room" located at the church at 4800 Lomas in Albuquerque; be prepared to discuss your involvement with Cheryl Hays. Please be advised that your deposition will not be limited to these areas. Thank you for your time and consideration in this matter.

On Aug 11, 2017 3:17 PM, "James Jones" <jlkjones@me.com> wrote:

Mr. Matthews---

The 14th of August is the first available day that was requested from me the week of. I am not available the 15th due to a mediation scheduled here in Albuquerque pertaining to another business matter.

I am also available should you decide to come to Albuquerque to depose me. I can also do it by phone or video conference if necessary.

I will continue to work to be flexible as it has been afforded to you in the past two months regarding your health.

Thanks for your consideration.

Public Loyalty Creates Private Leverage, James L'Keith Jones, DD

On Aug 11, 2017, at 1:55 PM, Justin Jeter <justin@jetermelder.com> wrote:

Let's do Friday the 25th. I simply cannot get the 15th to work unless we agree to start by phone at 1:00. Will your office enter a Rule 11 agreeing to move it to that date?

Thank you.

Justin

Case 2:16-cv-00238-D Document 53-1 Filed 09/15/17 Page 27 of 138 PageID 431

Jeter Melder, Ilp 214.699.4758 http://jetermelder.com



On Aug 11, 2017, at 2:54 PM, Warren McDonald wmcdonald.lawofficesofigm@gmail.com wrote:

Justin.

It is not looking good for scheduling on the dates you requested. It looks like the only date available for everyone next week will be Friday the 25th. Hopefully we can get Tuesday the 15th to work for everyone. Thanks.

On Aug 11, 2017 2:27 PM, "Justin Jeter" < justin@jetermelder.com > wrote: Warren,

If you will agree to move her deposition to August 21, 22, or 23, which is outside the discovery period, then I will agree to reschedule it. I will need, however, a Rule 11 agreement moving this deposition because it would have to occur outside the discovery period.

My other alternative would be to take her deposition on August 15 by telephone beginning at 1:00 - with me in Dallas and you all at your offices. I can be done by 5:00.

Please let me know what works best for you and Ms. Pollard.

Justin

Jeter Melder, Ilp 214.699.4758 http://jetermelder.com

<JM Email Logo.jpg>

On Aug 11, 2017, at 2:23 PM, Warren McDonald wmcdonald.lawofficesofigm@gmail.com wrote:

Justin,

I am sending you a copy of the email that I sent to Mr. Jones on August 3rd explaining that Ms. Pollard's deposition was scheduled for the week of August 14th, not on August 14th. Back on August 3rd, we had not set the date yet. We never heard back from Mr. Jones and you requested the 15th of August, which we agreed to. Again, we have tried to move schedules around to accommodate your request to move to the 14th and we could not make that happen. If this cannot get done on Tuesday, August 15th at 10 am in Lubbock then we will have to reschedule for the week of August 21. Thank you.

Case 2:16-¢v-00238nDaugDpcument:53-14M, Filestin9615/17 Page 28 of 138 PageID 432

<justin@jetermelder.com> wrote:

Can we do both on the 14th since Bishop Jones has travel already planned?

Justin

Jeter Melder, Ilp 214.699.4758 http://jetermelder.com

<JM Email Logo.jpg>

On Aug 11, 2017, at 2:08 PM, Warren McDonald wmcdonald.lawofficesofjgm@gmail.com wrote:

Mr. Jones,

I contacted you asking you your availability during the week of the August 14th. We did not set a date of August 14th. We asked you that because we had Ms. Pollard's deposition being scheduled during that same week and wanted to do both at the same time. We never heard back from you so we went ahead and moved everyone's schedule around to accommodate Mr. Jeter's requested date of August 15th to depose Ms. Pollard. Please be at 1401 Crickets Ave, Lubbock, Texas at 10 am on the 15th and as soon as we finish Ms. Pollard's deposition we will depose you. Thank you for your time and consideration in this matter.

On Aug 11, 2017 1:31 PM, "James Jones" <jlkjones@me.com> wrote:

Mr. Matthews---

I will comply to the deposition order that was executed per Mr. McDonald.

Per Mr. McDonald's voicemail 8/10/17, I will make myself available on August 14, 2017. Please confirm the time and place ASAP! I have already made travel arrangements to be there on August 14, 2017 and to leave August 14, 2017.

Look forward to your reply.

James LaKeith Jones

<Screenshot_20170811-141514.png>

Case 2:16-cv-00238-D Document 53-1 Filed 09/15/17 Page 29 of 138 PageID 433

```
1
               IN THE UNITED STATES DISTRICT COURT
               FOR THE NORTHERN DISTRICT OF TEXAS
2
                        AMARILLO DIVISION
3
   KIMBERLY D. POLLARD AND
    J.S. (A MINOR CHILD),
4
                  PLAINTIFFS,
5
   VS.
                                    CIVIL ACTION
6
   CHURCH OF GOD IN CHRIST.
                                    NO.: 2:16-CV-238-J
7
    INC.. AN ACTIVE DOMESTIC
    TENNESSEE NONPROFIT
   CORPORATION, AND CHURCH OF
8
   GOD IN CHRIST, BOARD OF
    BISHOPS, AND BISHOP JAMES
    LaKEITH JONES,
10
                   DEFENDANTS.
11
12
                ORAL AND VIDEOTAPED DEPOSITION OF
13
                       JAMES LaKEITH JONES
14
                         AUGUST 30, 2017
15
16
        ORAL AND VIDEOTAPED DEPOSITION OF JAMES LAKEITH
17
   JONES, produced as a witness at the instance of the
18
   PLAINTIFF, and duly sworn, was taken in the above-styled
19
   and numbered cause on the 30th day of August, 2017, from
20
   1:00 p.m. to 3:10 p.m., before Cathy Sosebee, CSR in and
   for the State of Texas, reported by machine shorthand,
21
22
   at the law offices of Ron McLaurin, 1401 Crickets
23
   Avenue, Lubbock, Texas, pursuant to the Federal Rules of
   Civil Procedure and the provisions stated on the record
24
25
   or attached hereto.
```

```
1
                      APPEARANCES
 2
   FOR THE PLAINTIFFS:
      COMP. FRONALD T. SPRIGGS
 3
        MR. LEVI SPRIGGS
        Spriggs Law Office
 4
        1011 S. Jackson Street
        Amarillo, Texas 79101
5
        806.376.7260
6
        spriggslawronald@gmail.com
7
        -and-
8
        MR. JERRY MATTHEWS
        Attorney at Law
        300 West Bedford Street
9
        Dimmitt, Texas 79027
        806.647.0404
10
11
        -and-
12
        MR. RONALD MCLAURIN
        Attorney at Law
13
        1401 Crickets Avenue
        Lubbock, Texas 79401
        806.741.1103
14
15
   FOR DEFENDANT CHURCH OF GOD IN CHRIST:
16
        MR. JUSTIN L. JETER
        Jeter Melder, LLP
17
        1111 South Akard, Suite 100
        Dallas, Texas 75215
18
        214.699.4758
19
        justin@jetermelder.com
20
   ALSO PRESENT:
21
        MR. WARREN MCDONALD
22
23
24
25
```

1		INDEX		
2	1		PAGE	
3	Anne	earances		
4	JAMES LaKEITH JONES			
5	JAIL		4	
	٥.	Examination by Mr. Ronald Spriggs		
6	Signature and Changes89			
7	Reporter's Certificate91			
8	EXHIBITS			
9	NO.	DESCRIPTION	PAGE	
10	1	Statement of Alleged Violation	56	
11	2	Order Denying Motion	57	
12	3	Residential Lease Agreement	84	
13	4	Nusenda Credit Union document	84	
14				
15	5	Rental Agreement Renewal Offer	84	
16	6	2016 W-2s	84	
17	Attachment - Wells Fargo Document 88		88	
18		REQUESTED DOCUMENTS/INFORMATION		
19	NO.	DESCRIPTION	PAGE	
20	1	Last three years tax returns	19	
21	2	Cathy Parmar's email and phone number	21	
22	3	Krissia Coleman's email and phone number	22	
23				
24				
25				

```
1
                      JAMES LaKEITH JONES,
2
   having been duly sworn, testified as follows:
 3
                           EXAMINATION
4
   By Mr. Ronald Spriggs:
5
            Okay. Bishop Jones, is it okay to call you
6
   Bishop Jones?
7
        Α.
            That's fine, whatever is comfortable with
8
   everybody.
9
        Q. Okay. I am going to be asking you some
   questions. As you know, there is a judgment against you
10
11
   of $700,000?
        Α.
            Yes
12
13
            And this deposition, in part, is to try to find
   assets to collect that debt. Do you understand?
14
15
        Α.
            Yes, sir.
16
        Q.
            Okay. Could you please state your name?
17
        Α.
            James LaKeith Jones.
18
        Q.
            James LaKeith?
            Yes.
19
        Α.
20
            How do you spell LaKeith?
        Q.
21
        Α.
            Capital L-A capital K-E-I-T-H, Jones,
   J-0-N-E-S.
22
23
        Q.
            Where were you born?
            Hobbs, New Mexico.
24
        Α.
25
        Q.
            Hobbs, huh?
```

```
1
        Α.
             Yes, sir.
 2
        Q.
             What is your date of birth?
 3
        Α.
             3/20/65.
        Q.
 4
             And do your parents still live there in Hobbs?
 5
        Α.
             My mother is still alive.
 6
        Q.
             What is your mother's name?
 7
        Α.
             Catherine Clay.
 8
        Q.
             Clay, C-L-A-Y?
 9
        Α.
             Yes, sir.
10
        Q.
             What is your father's name?
11
             He is deceased, Joe Jones, Sr.
        Α.
12
        Q.
             Where did he pass away, Hobbs also?
13
             Yes, sir.
        Α.
14
        Q.
             Okay. Do you have your driver's license with
15
   you?
16
        Α.
             I do.
17
        Q.
             And by the way, if you don't understand my
18
   question, let me know, and I will rephrase it for you so
19
   you could understand it. But if you answer I am going
20
   to assume that you understood the question, okay?
21
   And -- all right. I am getting old; I need these
22
   glasses.
23
                  It says driver's license number is
24
   026111323?
25
             Yes, sir.
        Α.
```

```
1
        Q.
             It expires in 4/20/2022. It says you are
 2
   six-one, brown eyes, you have no endorsement. You don't
 3
   ride a motorcycle or anything?
 4
        Α.
             I don't think I need to do that.
 5
        Q.
             Here you go. I will give you that back.
 6
                  I have a question. What is your Social
 7
   Security number?
             525 - - -
 8
        Α.
 9
        Q.
             525?
10
        Α.
             -- 15-3797.
11
        Q.
             Now, did you go to school in Hobbs?
12
             I did, sir.
        Α.
13
        Q.
             Did you graduate from high school there?
14
             I did, sir.
        Α.
             And did you go to college?
15
        Q.
16
        Α.
             I did, sir.
17
             Where did you go to college at?
        Q.
18
        Α.
             New Mexico Junior College and University of New
19
   Mexico.
20
             UNM in Albuquerque?
        Q.
21
        Α.
             Yes, sir.
22
             Okay. Did you graduate?
        Q.
             I did, sir.
23
        Α.
24
        Q.
             What did you get your degree in?
25
        Α.
             Social psychology.
```

- 1 Q. Do you have a BA or a master's or --2 Α. It is a BA. 3 What is that again, social psychology? Q. 4 Yes, sir. Α. 5 Q. And then what year did you graduate from 6 college? 7 Α. 1989. 8 Q. And what did you do upon graduation? I worked for ITT Financial. 9 Α. What did you do for them? 10 Q. 11 I was an assistant manager for approximately Α. 12 three years. Is that one of those places where you give 13 Q. loans out? 14 15 Α. Yes, sir. 16 Q. So you were sort of like a loan officer, too? Well, I wasn't considered a loan -- it was just 17 Α. 18 assistant manager, so I never had the title as a loan 19 officer. 20 Q. You did that for three years? 21 Α. Yes, sir. 22 Right there in Albuquerque? Q.
 - A. After that I freelanced. I did freelance

What did you do after that?

23

24

25

Α.

Q.

I did, sir.

```
1 ministry from that time until 1995, October 1995.
```

- Q. So how many years is that that you did freelance?
 - A. Probably about four years, '91 to '95.
- Q. After you did the freelance, what did you do?
 - A. I started pastoring in October 1995.
 - Q. You started pastoring where at?
 - A. In Albuquerque, New Mexico.
 - Q. How many years did you do that?
- 10 A. Present,

3

4

5

6

7

8

9

16

17

18

- 11 Q. Until the present?
- 12 A. Yes, sir.
- Q. Okay. Now, when you started preaching there in Albuquerque in '95, did you have a church? Did you have any type of --
 - A. I was assigned to a church and started pastoring in '95. I was already in ministry. I was already preaching from '91 to '95. So I was assigned to a church in October 1995.
- Q. Where was that church located?
- 21 A. Albuquerque, New Mexico.
- Q. What was the street address?
- 23 A. 1120 Second Street Northwest.
- Q. How long were you at that particular church?
- 25 A. I am still there. I mean I am still at the

- 1 church itself.
- Q. You are still at that same church?
- A. No, we are at 4800 Lomas now, so from '95 -- I
- 4 mean I was there with the building from '95 until 2013,
- 5 so from 2013 we have been at 4800 Lomas.
- Q. Now, is this place on Lomas, is that a bigger
- 7 building or a newer building?
- 8 A. It is a bigger building. I don't know about
- 9 newer, but it is a bigger building.
- 10 Q. How many people attended that church on -- how
- 11 many members did you have in the church on Second
- 12 | Street?
- 13 A. When we left or when I started?
- 14 Q. When you left.
- 15 A. Probably 150.
- 16 Q. How many people at the church currently on
- 17 Lomas?
- 18 | A. Maybe 200.
- 19 Q. How much bigger is the building on Lomas than
- 20 on Second Street?
- 21 A. The building on Second Street was 11,000 square
- 22 feet, 11,500. The one on Lomas is 21,200.
- 23 Q. Do you plan to fill that church up on Lomas?
- 24 A. I want to fill all of them up if I can.
- 25 Q. That is a yes? Okay. So what is your

```
1
   position -- when did you join the Church of God in
2
   Christ?
3
             I was born in Church of God in Christ.
        Α.
4
        Q.
             Okay. So your parents attended the church?
5
        Α.
             Absolutely. I am a third generation Church of
6
   God in Christ.
7
        Q.
             So you have been going there since you were a
   baby, I guess, right?
8
9
        Α.
             Yes, sir.
             Now, have you ever been married?
10
        Q.
11
        Α.
             Yes, sir, once.
12
             Who were you married to?
        Q.
             Rosalind.
13
        Α.
14
             How do you spell that?
        Q.
             R-0-S-A-L-I-N-D.
15
        Α.
16
        Q.
             Rosalind. What is her last name?
             Jones.
17
        Α.
18
        Q.
             Are you currently married to Rosalind?
19
             Yes, sir.
        Α.
20
        Q.
             Where do you-all reside?
21
        Α.
             In Albuquerque.
             Her street address?
22
        Q.
23
             10525.
        Α.
        Q.
             10525?
24
25
             Yes, sir, Royal Birkdale.
        Α.
```

- 1 Q. Royal?
 - A. Birkdale.
- 3 Q. Birk?

- A. Yes, sir, Birkdale Northeast.
- 5 Q. Do you own the house?
- 6 A. No, sir, rent.
- Q. You rent? How much do you pay for rent a month?
- 9 A. 2,600.
- Q. Now, when you were at the church on Second
 11 Street, were you being paid by the church?
- A. Yes, up until a certain point, until we got
 ready to purchase a building and move, so probably,
 whatever my housing was, that is what I was getting paid
 and, of course, that is still the same -- same
 stipulation now.
- 17 Q. So when you were on Second Street, you were 18 being paid a housing allowance?
- 19 A. Yeah, that's it \$2,600 a month.
- 20 Q. Okay. So you are getting paid \$2,600 a month?
- 21 A. Yes, sir.
- Q. How would they pay that to you? Would that be in check? Would that be direct deposit?
- A. Sometimes it is paid directly to the landlord or sometimes it is -- it would be direct deposit. I

```
1 never received any checks from the church.
```

- Q. That was the church paying you every month?

 What day would they pay that?
 - A. Probably Mondays.
 - Q. Mondays?
- 6 A. Yes.

5

- Q. Did they have like a 15th or 1st?
- A. Monday every week so -- and if it -- whatever day it was for the total collection, it would always be on a Monday so.
- 11 Q. So they would pay you out of the collections?
- 12 A. Yes, sir.
- Q. Who would actually handle the money? Who would get the money?
- 15 A. Finance board.
- Q. Finance board would get the money, and then they would pay you 2,600?
- A. Yes, sir, or it is either broken down biweekly
 or every week, or it depends on what the collection
 amount would be. So it is no set amount and no set
 consistent pay.
- Q. Okay. So some weeks you get more than other weeks?
- A. No, sir, I would get 2,600 a month, so some
 weeks it may be -- it usually try to average out to, you

```
know, eight -- 700, $800 a week, to try to come up with
1
   the 2,600.
2
3
        Q.
             So some weeks you may get 600, the next week
   you may get 800?
4
             Possibly, or some weeks it would be zero.
5
6
        Q.
                    But at the end of the month, though, is
7
   that right, it would be 2,600?
        Α.
             Yes, sir.
8
9
        Q.
             And that is what they are still currently
10
   paying you?
11
        Α.
             Yes, sir.
12
             Do you have any type of health benefits?
        Q.
13
             No, sir, not with -- not with -- not with the
        Α.
14
   church.
15
        Q.
             Who do you have your health benefits with?
16
        Α.
             Through D's Personal Care. That is my regular
17
   job.
18
        Q.
             You said D's Personal Care?
19
             Yes, sir.
        Α.
20
        Q.
             Is it just D-E-E?
             D's Personal Care.
21
        Α.
             And what is that?
22
        Q.
             It is a home health care business.
23
        Α.
24
        Q.
             That is in Albuquerque?
```

Α.

Yes, sir.

```
1
        Q.
             Do you own that business?
 2
        Α.
             No, sir.
 3
        Q.
             What do you do for them?
             Just administrative clerk.
 4
        Α.
             Administrative clerk?
 5
        Q.
 6
        Α.
             Yes, sir.
 7
        Q.
             What is your job duties?
 8
        Α.
             Filing papers, clerical duties.
 9
        Q.
             And what do D's pay you?
10
        Α.
             The minimum wage, and that is direct deposit so.
11
        Q.
             How many bank accounts do you have?
12
        Α.
             A savings and a checking, and I have one
13
   business expense account, so I guess maybe three.
14
        Q.
             Who are they with?
             Nusenda Credit Union.
15
        Α.
16
        Q.
             Nusenda?
             Nusenda, N-U-S-E-N-D-A.
17
        Α.
        Q.
             N-U-S --
18
19
             -- E-N-D-A Credit Union, and the business
        Α.
20
   expense is Wells Fargo.
21
        Q.
             Business is Wells Fargo?
22
        Α.
             Yes, sir.
23
        Q.
             Now, are these accounts --
24
        Α.
             The savings and the checking is joint.
             With who?
        Q.
25
```

```
1
        Α.
             Rosalind.
 2
        Q.
             With Rosalind?
 3
        Α.
             Yes, sir.
        Q.
             But those are personal accounts?
 5
        Α.
             Yes, sir.
        Q.
 6
             Okay. Now, the Wells Fargo account --
 7
        Α.
             Is just the church business account, and I am
 8
   the only one on that.
 9
        Q.
             That is just church and business account?
10
        Α.
             Yes, sir, it is a business expense account so.
11
        Q.
             Okay. So how much money is normally in this
12
   Wells Fargo account?
13
        Α.
             Usually it is in the negative, so I don't think
14
   there is hardly anything.
15
        Q.
             Do you have account numbers for these accounts?
16
        Α.
             I do.
17
        Q.
             Could you give those to me, please?
             The business and checking -- I mean the
18
        Α.
19
   checking and savings is 139 --
20
        Q.
             139 --
21
        Α.
             -- 1630.
22
        Q.
             -- 1630; is that correct?
23
        Α.
             Yes, sir.
24
        Q.
             And that's for both accounts, the savings and
25
   the checking?
```

```
1
        Α.
             Yes, sir, it is. And the Wells Fargo is 853 --
 2
        Q.
             853 --
 3
             Yes, sir -- 509 --
        Α.
 4
        Q.
             509 --
 5
        Α.
             -- 7821.
 6
        Q.
             -- 7821.
 7
        Α.
             Yes, sir.
 8
        Q.
             Okay. And that's the business account?
 9
        Α.
             Business expense account.
10
        Q.
             Business expense account?
11
        Α.
             Personal expense, not the business itself.
12
        Q.
             Okay. So you just use that one to pay your
13
   expenses?
14
             They use that to pay any stipends that I may
        Α.
15
   get or offerings or anything, but that is rare, so I
16
   only use it just for, I guess, maybe as a shield or
17
   something.
18
                   Now, who deposits money in that account?
        Q.
             Okay.
19
        Α.
             I do.
20
             And where do you get the money that you deposit
        Q.
21
   in that account?
22
        Α.
             If I do a speaking engagement, that is where
23
   that money goes.
24
        Q.
             Okay. How much do you charge for speaking
25
   engagements?
```

- 1 A. I don't charge.
- Q. Does the place where you are speaking at pay your expenses?
 - A. No, most of the time they don't. It is all sometimes included in the honorarium, and that is hard to say, but, you know.
 - Q. Okay. Now, this savings and checking account, that is your personal account for you and your wife?
 - A. Correct.

5

6

7

8

- 10 Q. And is that where your pay gets deposited at, 11 your pay from the Church of God in Christ?
- A. Well, usually here lately they pay directly to
 the landlord, which is my rent, so I don't -- there is
 not a deposit normally going to that account at all, so.
- 15 Q. So they just pay your rent?
- 16 A. Yes, sir, I think I said that at the beginning.
- 17 | Maybe I didn't make that clear.
- 18 Q. You said they pay your rent?
- 19 A. Yes, sir.
- Q. So you don't receive checks so -- okay. Now, 21 does your wife work?
- 22 A. She does.
- Q. Where does she work at?
- 24 A. She is APS, Albuquerque Public Schools.
- Q. Okay. What does she do at the schools?

- 1 A. Substitute teacher.
- Q. Did you file taxes for the last three years?
- A. Yes, I did. I don't have the returns with me,
- 4 though, but I did.
- Q. Now, if I ask you to attach copies -- I think you probably want to read and sign, right?
 - A. I am sorry?
- Q. When we take your deposition, typically you do
 what you call read and sign. Let me explain that to
 you. What that means is when she types everything up,
- 11 before she makes it official, she will send you a copy.
- 12 You get to read it and make any corrections that you may
- 13 | -

- 14 A. I understand.
- 15 Q. -- need to make?
- 16 | A. Yes, sir.
- Q. Like if you misquote a number or something, you
- 18 say, "Well, no, it is not 21, it's 22," or whatever.
- 19 You know, you can make those corrections --
- 20 A. Yes, sir.
- 21 Q. -- on a sheet at the end. And I am asking you
- 22 would you be willing to attach your last three years of
- 23 | taxes --
- 24 A. Yes, sir.
- 25 Q. -- when you get that?

1 A. Yes, sir.

2

4

- Q. So you will agree to do that?
- 3 | A. Yes, sir.

(Requested Information 1)

- Q. Okay. Because she will send that to you and,
 in fact, I think she has your address, but let's go
 ahead and put it in the deposition so she will make sure
 she has it. She will probably mail that to you. You
- 10 A. I do, sir.
- 11 Q. All right. And what is the home address?
- A. The mailing address would be P.O. Box 30104.
- 13 Q. Repeat that one more time.
- 14 A. P.O. Box 30104, Zip Code 87190.

still live in Albuquerque, correct?

- 15 Q. That's Albuquerque, New Mexico, right?
- 16 A. Yes, sir.
- Q. She will probably mail it to you, and I think you will have 20 days to look it over and make the
- 19 | corrections.
- 20 A. Yes, sir.
- Q. And then you will be instructed to mail it back
- 22 to her once you do that, and you will sign the bottom.
- 23 | I think you have to get it notarized if you make
- 24 corrections. So if you make corrections, you get it
- 25 | notarized.

- 1 Α. Okay. 2 Q. I am not trying to give you legal advice. I am 3 just trying to tell you how this process works so you 4 can get it done. Okay? 5 Α. No problem at all. 6 Q. I don't want you to think that I am giving you 7 legal advice. I am just telling you how the process is 8 working, how you need to get it back to her. Do you understand that? 10 Α. Yes, sir. 11 Q. Okay. Who is your landlord? 12 Α. Cathy Parmar. 13 Q. Cathy? 14 Α. Parmar, P-A-R-M-A-R. 15 Q. And is she in Albuquerque? 16 No, sir. Α. 17 Where is she at? Q. 18 Α. California. 19 Q. Do you have an address for her?
- is Q. Do you have an address for
- 20 A. I don't.
- 21 Q. How do you pay your rent then?
- A. It is deposited directly into an account provided by her.
- Q. Do you have that information at home, her address or phone number?

```
1
        Α.
             I don't have -- she has never given me her
 2
   address.
              I don't think I am privy to have her address,
 3
   but an email probably and I may have her phone number.
 4
        Q.
             Can I ask you also to, when you get your copy
 5
   of the deposition, could you provide that information to
 6
   us?
 7
        Α.
             Sure.
 8
                  (Requested Information Two)
 9
        Q.
             0kay?
             I probably won't have the address, but I will
10
11
   be --
             Whatever information you have, email address,
12
        Q.
13
   would you provide that?
14
        Α.
             Okay.
15
             And now so you have just been married the one
        Q.
16
   time?
17
        Α.
             Yes, sir.
18
        Q.
             To Rosalind who you are still married to?
19
        Α.
             Yes, sir.
20
        Q.
             Do you have children?
21
        Α.
             No. sir.
22
             You have no children?
        Q.
23
        Α.
             Just one that -- not between us.
24
             You have one child?
        Q.
25
        Α.
             Yes.
```

```
Where does that child live?
 1
        Q.
 2
        Α.
             I have no idea. I don't know.
 3
             What is the child's mother's name?
        Q.
             The child's mother's name?
        Α.
 4
        Q.
             Uh-huh.
 5
 6
             Krissia, K-R --
        Α.
 7
        Q.
             K-R --
        Α.
             -- I-S-S-I-A.
 8
        Q.
             Krissia. What is the last name?
 9
10
        Α.
             Coleman.
11
             And you don't know where she lives either?
        Q.
             No, sir, I don't.
12
        Α.
13
             You have no phone number or email for Krissia
        Q.
14
   Coleman?
15
        Α.
             I don't.
16
             How did you meet --
        Q.
17
        Α.
             I may have an email address, maybe.
             Okay. Once again, if you could look, when you
18
        Q.
19
   get your deposition, --
20
        Α.
             Okay.
21
             -- you will be reading this, too, and if you
22
   can insert that, if you will provide us with her
23
   information?
24
                  (Requested Information Three)
        Α.
             Sure.
25
```

```
1
        Q.
             And do you know the child's birthdate?
 2
        Α.
             I don't.
 3
             Do you know about how old the child is?
        Q.
 4
        Α.
             She will be 20, maybe 21.
 5
        Q.
             Somewhere around the early 20s?
 6
        Α.
             20, maybe turning 21.
 7
        Q.
             Okay.
 8
        Α.
             It was before I got married so.
 9
        Q.
             Before you got married?
10
        Α.
             Yes, sir.
11
        Q.
             How long have you been married to Rosalind?
12
        Α.
             20 years.
13
        Q.
             20 years, huh? That's the only child you have?
14
        Α.
             That's correct.
15
        Q.
             And I am sorry; I may have asked you this.
16
   What is the child's name?
17
        Α.
             Bynae.
18
        Q.
             How do you spell that?
             I think it is -- I hope I am correct, B-Y-N-A-E.
19
        Α.
20
        Q.
             B-Y?
21
        Α.
             -- N-A-E.
22
        Q.
             Bynae Coleman?
23
        Α.
             I believe that's correct.
24
        Q.
             How did you meet Krissia?
25
             At a church service.
        Α.
```

```
1
        Q.
             So she was a member of the same church?
 2
        Α.
             No, sir, at a church service in Alamogordo, New
 3
   Mexico.
 4
        Q.
             Alamogordo?
 5
        Α.
             Yes, sir.
6
        Q.
             How old was she; do you recall?
 7
        Α.
             No, I don't. And I don't even know how old she
8
   is now.
9
        Q.
             Okay.
10
        Α.
             I would assume we are close to the same age
11
   bracket possibly.
12
        Q.
             Okay. So you have no contact with Bynae?
             No, sir.
13
        Α.
14
        Q.
             Is that your choosing or her choosing?
15
        Α.
             Both.
16
        Q.
             Okay. Do you have any other children?
17
        Α.
             No. sir.
18
        Q.
             Do you have any other type of assets?
             Such as?
19
        Α.
20
             What do you own that is more than $500?
        Q.
             About two cars, and I mean I don't have the
21
        Α.
22
   titles to those.
23
        Q.
             What kind of cars are they?
24
        Α.
             It is a 2009 -- both of them are 2009, Lincoln
25
   MKS and a 2009 Lincoln Volvo.
```

- Are you still paying on those two cars? 1 Q. 2 Α. I am. 3 What are your payments on them? Q. The Lincoln is 550 a month, and the Volvo is 4 Α. 440, I believe. 5 6 Q. And so you pay this with the money you earn from D's Personal Care? 7 Well, and Rosalind's income as well. 8 Α. 9 Q. Do you have any other sources of income besides D's? 10 No, sir. 11 Α. Do you receive any other money from anyplace 12 Q. else? 13 No, sir. 14 Α. 15 Q. Are these the only two assets that you have 16 worth more than \$500 is the two cars? 17 Α. Yes, sir. 18 Q. You don't have any CDs or any land? No, sir. 19 Α. Now, do you have a -- do you have any insurance 20 Q. 21 from the church? Does the church provide you with any 22 insurance?
- A. As far as?
- Q. Any insurance as far as like, for lack of better word, sort of malpractice insurance?

- 1 A. Oh, no, sir.
- Q. If you make any type of mistakes or anything 3 like that?
- A. No, sir, No, sir. We had it when we were at 1120. When we moved to the new building, because of expenses, we eliminated all property and liability
- 7 insurance.
- Q. So what year was that that you let the insurance go?
- 10 A. 2012.
- 11 Q. Do you have copies of that?
- 12 A. No, sir, I don't.
- Q. Because some of the events that are alleged happened before 2012, correct?
- 15 A. I wouldn't -- I mean.
- 16 Q. I mean you know what was alleged?
- 17 A. I presume so. I mean --
- 18 Q. Because you -- I mean some -- I will just tell
- 19 you this: Some of the incidents that were alleged
- 20 against you are alleged to have happened before 2012,
- 21 and therefore your insurance may cover that.
- 22 A. Okay.
- Q. Do you have any papers at home --
- A. No, sir, I don't.
- Q. -- that may say who the insurance was with?

- Case 2:16-cv-00238-D Document 53-1 Filed 09/15/17 Page 57 of 138 PageID 461 I believe it was Brotherhood Mutual maybe. 1 Ι 2 think that's the name of the insurance company, 3 Brotherhood Mutual. 4 Q. Okay. Where were they out of? Somewhere in the midwest. I don't even know. 5 Α. 6 I never handled that so. Who handled that? 7 Q. The finance committee at the church. 8 Α. 9 Q. Is there any way you can go back and look in 10 the records and see where they may be at or their office 11 is at? 12 Α. I can't right now, but I mean it would probably be a couple of months or three months before I can get 13 14 to that. I am not allowed to touch any of the church 15 records right now.
 - 16 Q. Okay. I mean you could make phone calls and ask, though, couldn't you? 17
 - 18 No, sir, I can't. Α.
 - You can't? 19 Q.
 - 20 No. sir. Α.
 - 21 Q. Who would have that information?
 - 22 Α. Finance committee, I mean you probably could 23 call the church.
 - 24 Q. What person?
 - 25 Possibly Rita Morgan. Α.

```
1
        Q.
             Rita Morgan?
 2
        Α.
             Yeah.
 3
        Q.
             Do you have a phone number for Rita?
        Α.
             I don't.
 4
 5
        Q.
             I have just been handed a note here. I have
6
   some text messages. Let me let you take a look at them.
7
        Α.
             Sure.
8
        Q.
             Do you recognize those?
9
        Α.
             Yes.
10
        Q.
             Are those yours?
11
             Yes.
        Α.
12
        Q.
             So you made those text messages in --
13
        Α.
             I think those were very inconclusive text
14
   messages. It is not an ongoing dialogue so -- we don't
15
   have a relationship, you know, so --
16
        Q.
             But the gray text messages are yours, correct?
17
   I will let you look at that again.
18
        Α.
             Yes, sir.
19
        Q.
             Okay.
20
                  MR. JETER: I would like to see those.
21
   have never seen those text messages.
                  MR. RONALD SPRIGGS: (Indicating)
22
23
             (By Mr. Ronald Spriggs) Would you like some
        Q.
24
   water?
25
        Α.
             No, I am good, sir. Thank you.
```

```
1
        Q.
            The gray texts -- let me see if I can read it
2
   here. Okay.
                 Let me start here.
 3
                 "Likewise we are on the same page maybe.
4
   There is a difference in fighting for and fighting with.
   I never detected that there was a fight for a
5
6
   relationship. Again, it isn't my MO to create or be
7
   involved in any drama. Sorry you feel the way you do."
8
                 Okay. Take a look at the top one there,
   make sure I read that correctly.
10
        Α.
            Yes, sir, you did.
11
        Q.
            Okay. The second one here, I can't read that
12
   one. Oh, it says, "On November 3rd, 20" -- is that 16?
13
   "Kimberly Pollard filed a $12.2 million lawsuit against
14
   the Church of God in Christ and Bishop LaKeith Jones."
15
                 Did I read that one correctly? It is hard
16
   to see there.
17
        Α.
            Yes, she sent that.
18
        Q.
            She sent that to you?
            Yeah, she sent that. I didn't send that.
19
        Α.
20
        Q.
            Okay. But these two right here are the ones
21
   that you sent, that one and that one?
22
        Α.
            That's correct, sir.
23
        Q.
            Let me read those. Okay.
24
                 "Sorry, can I -- why are we talking?"
25
                 And the next one says here, "Not talking to
```

```
1
   me like you are. Have never talked to you like you have
 2
   talked to me, nor have I said the things you don't know.
 3
   Despite, I have respect -- I respected your grandma and
   your mother."
 4
        Α.
             Uh-huh.
 5
        Q.
             Did I read that one correct?
 6
 7
        Α.
            Yes, sir.
 8
        Q.
             Okay. There are some more text messages here,
 9
   too. Did you send that one, you're like, "No problem,"
10
   that one there?
11
        Α.
             I believe that's correct. I don't know.
12
   don't think that is all in the same conversation but --
13
        Q.
             Maybe a different conversation?
14
        Α.
            Yes, sir.
15
        Q.
             But those are your text messages, though?
16
            Yes, sir, that's correct.
        Α.
17
            Okay. Who is the other person that you are
        Q.
18
   talking to on here, these text messages? Who did you
19
   believe you were sending them to?
20
            Only Bynae, that's the only one I ever know.
        Α.
21
        Q.
            Okay. This right here, like they show dates on
22
   here. Let me see here. What is the date on this one?
23
   I am scrolling up here. This says July 14th. It
24
   doesn't show a year, but this is what you sent to Bynae?
             Or what Bynae sent to me. Probably most of
25
        Α.
```

```
1
   those are responses to her sending me a text. I have
2
   never met her.
3
        Q.
             But when you were sending these texts, you
   believed you were sending them to Bynae?
4
        Α.
 5
            Yeah, because she sent them to me, so I
   don't --
6
7
        Q.
            Okay. Bynae is your daughter, correct?
            That's correct, sir.
8
        Α.
9
        Q.
            Okay. Now, you said earlier you don't have any
10
   contact with her?
11
        Α.
            I don't.
12
        Q.
            Yet we have text messages that you sent to her?
13
        Α.
             Those are sporadic. I am saying I don't have a
14
   relationship with her is what I said. So I don't have
15
   any type of ongoing dialogue with her. So these are
16
   sporadic texts that I would get every now and then.
17
        Q.
             So you were just responding to texts that she
18
   sent you?
19
        Α.
             Absolutely, because I don't know -- I never
20
   knew any of her phone numbers. Only one she would send
21
   a text from would be maybe an email address or
22
   something.
23
        Q.
             Uh-huh.
24
        Α.
             I do know that when she went to college I got
25
   maybe a call or something, a questionnaire or something
```

```
1
                I mean that is how -- probably the most we
   like that.
 2
   have ever dialogued in maybe 20 years.
 3
        Q.
             Okay. What is your email address?
             JLKJones@ --
        Α.
 5
        Q.
             JLKJones --
 6
        Α.
             -- me.com.
 7
        Q.
             At what?
 8
        Α.
             me.com.
 9
        Q.
             Is this the only one you have?
10
        Α.
             I have several email addresses probably,
11
   pastorJLJ@AOL.com.
12
        Q.
             Spell it out for me, please?
13
        Α.
             P-A-S-T-O-R-J-L-J@AOL.com.
14
        Q.
             Any more?
15
        Α.
             BishopJLKJ@gmail.com.
16
        Q.
             Bishop --
17
        Α.
             JLKJ.
18
        Q.
            -- JLKJ?
19
             JLKJ@gmail.com.
        Α.
20
             And those are the only three?
        Q.
21
             Yeah, probably the other ones are probably
        Α.
22
   defunct. I wouldn't sign on them. I don't even know
23
   them.
24
        Q.
             How many defunct email addresses do you think
25
   you have?
```

- A. Right now three. Probably I have had three old ones maybe that I don't recall.
 - Q. These are the three you have been using for the last couple of years?
 - A. Yes, sir.
- 6 Q. Okay. Do you know a Debra Singletary?
- 7 A. Yes.

4

- 8 Q. Who is she?
- 9 A. She is the supervisor at D's Personal Care.
- 10 Q. And what is your relationship with her?
- 11 A. She is the supervisor. She is my supervisor,
- 12 my boss.
- Q. And how do you receive your money from Personal
 Care, D's?
- A. I don't because usually the child support payments are normally taken out of that.
- 17 Q. So you pay child support?
- 18 A. Yes, sir.
- 19 Q. For who?
- 20 A. I am sorry?
- 21 Q. For who?
- 22 A. For Bynae, the one child.
- Q. Bynae you say is 20 years old, and you are still paying child support?
- 25 A. Yeah, arrears now, I have arrears so.

- 1 Q. How much are you in arrearage? 2 I want to say approximately 26,000, 26 to Α. 3 30,000 maybe. It should be less than that, but I mean it has been ongoing. I pay more than what I am required 4 5 to pay. 6 Q. How much do you pay per month? 7 One -- I believe it is like 142 a month. Α. 8 Q. And they just take it out of your check? 9 Α. Yes, sir. 10 Q. You say at D's you only make a minimum wage? 11 Α. Yes, sir. 12 Q. What is that, 4 -- what is minimum wage? Seven -- is it 7.50 an hour? 13 Α. 14 Q. Do you just work 40 hours a week? 15 Α. Yes, sir. 16 Now, in the Church of God in Christ what is Q. 17 your position? 18 I am a jurisdictional bishop. Α. I am sorry. Could you repeat that? 19 Q. 20 Α. A jurisdictional bishop. Jurisdictional? 21 Q. 22 Α. Yes, bishop. Okay. What does that mean, jurisdictional
- 25 Α. I have assigned territory in New Mexico

24

Q.

bishop?

```
jurisdiction.
 1
2
        Q.
             So are you in charge of the whole state of New
   Mexico?
 3
        Α.
             I am. sir.
        Q.
             What are your duties?
 5
6
             To preside over churches, to appoint pastors,
        Α.
7
   to bury pastors, to administrate conventions.
 8
        Q.
             So you appoint pastors?
        Α.
             I do.
9
10
             So if someone wanted to be a pastor, what must
        Q.
   they do?
11
12
        Α.
             Well, they are going to have to be qualified.
13
   They would have to go through a background check.
14
             What do you mean "qualified"?
        Q.
15
             Well, they would have to be qualified in -- for
        Α.
   ministry itself, based on probably their training, their
16
17
   experience.
18
        Q.
             Okay. Do they need to have like a degree or
19
   something?
20
             No, sir.
        Α.
21
        Q.
             Okay. Training and experience, what kind of
22
   training do they need?
23
        Α.
             Pastoral care.
```

Various ones either go to seminary, some of

How do you get that type of training?

24

25

Q.

- 1 them attend various workshops, conventions, books,
- 2 experience. Most of the time probably 90 percent of the
- 3 pastors are already what I would call lay elders already
- 4 presently at the church. So usually it is an ascension
- 5 from being an assistant pastor or an associate minister
- 6 being elevated to being pastor.
- Q. Okay. So basically it comes from somebody out
- 8 of the flock?
- 9 A. Usually.
- 10 Q. And do you go in and interview these people?
- 11 A. I do.
- 12 Q. Are you the sole one who makes that decision?
- 13 A. Yes, sir.
- 14 Q. And how long have you been doing that?
- 15 A. For -- since 2012.
- 16 Q. Do you send reports to the home office?
- A. Like what type of reports? You mean for the
- 18 end of year itself and all that?
- 19 Q. Yeah.
- 20 A. No. sir.
- 21 Q. Whatever type of reports that you have, do you
- 22 | send any reports to the home office?
- A. We send financial reports, yes.
- Q. How often do you do that?
- 25 A. Once a year. Well, twice a year. Twice a

```
1
   year, April, November.
2
            And what does the financial reports consist of?
3
        Α.
             Financial reports consist of the -- whatever
4
   the title is for that particular individual, usually the
5
   pastors or elders, ministers, our female evangelists,
6
   what I would call credential reports, so they possess
7
   cogent credentials, and they pay the reports.
        Q.
8
             So you do a finance report twice a year, what,
9
   with all the money that is raised in the State of New
10
   Mexico?
11
            For the credential holders. I don't have any
        Α.
12
   control over what the churches raise.
13
        Q.
             But you do get to see that, don't you?
14
             I suppose I do. I mean I have never asked for
15
        And usually a bishop does not control a local
   church finances. Each church is autonomous, so a bishop
16
17
   does not go in and oversee the finances of that church
18
   unless that church is vacant.
19
        Q.
             Doesn't the local churches send some money to
   the home office?
20
             No, sir.
21
        Α.
22
                 MR. JETER: Objection, form. You can
23
   answer.
             (By Mr. Ronald Spriggs) They don't?
24
        Q.
```

No, sir.

- 1 Q. All the local church's monies stay in the local 2 church? 3 Α. In the local church, yes, sir. Q. So how does the home office operate? 4 5 MR. JETER: Objection, form. You can 6 That's -- it is just for the record, the legal answer. 7 record. 8 I don't -- they have a budget, and so I Α. really -- I am not knowledgeable, because I don't 10 operate the -- I am not the financier, nor do I work for 11 the national church. I am only required to report the 12 credential holders. And however the church operates 13 itself, that is --14 Q. (By Mr. Ronald Spriggs) So you don't know of 15 any money being sent to the home office to support --16 No, no monies are sent. Our doctrine is not Α. 17 set up like that, for that. Okay. And you don't know how the home office 18 Q. 19 raises their money? 20 I am sure through offerings and from 21 conventions, credential reports, I am sure. 22 Q. Now, how many conventions do they have a year?
- MR. JETER: Objection, form.
- A. I mean I don't know. I am assuming five. It 25 is usually on the calendar on the website. So I have no

```
1
   knowledge of what the national church takes in or
 2
   what -- how they operate. I am not part of that.
                                                         I am
 3
   not on any boards or committees for that.
        Q.
             (By Mr. Ronald Spriggs) Do you have a -- how
 5
   often do you go to the home office?
 6
        Α.
             Once a year in April.
 7
        Q.
             In April?
        Α.
             Yes, sir.
 8
 9
        Q.
             Do all the bishops come in, or is this just the
10
   time that you go?
11
        Α.
             That's the time -- it is called an April Call
12
   Meeting, and usually we should come in. I don't know if
13
   all of us come in, but we should come in.
14
        Q.
             What is your relationship with Bishop Blake?
15
        Α.
             He is my superior leader.
16
        Q.
             Is he in charge of the church?
17
                 MR. JETER: Objection, form.
18
        Α.
             The local church?
19
             (By Mr. Ronald Spriggs) The home office, the
        Q.
20
   entire organization, is he the head guy?
21
                 MR. JETER: Objection, form.
22
        Α.
             He is the presiding bishop.
23
        Q.
             (By Mr. Ronald Spriggs) I am sorry.
24
   again, please?
25
        Α.
             He is the presiding bishop, yes.
```

```
1
                 MR. RONALD SPRIGGS: And I am going to
2
   object to your objection. I don't think you can object
 3
   unless you represent him. So I am objecting to your
   objections.
 4
             (By Mr. Ronald Spriggs) So he is the
5
        Q.
   presiding --
6
7
            He is the presiding bishop of the Church of God
   in Christ.
8
        Q.
             The presiding bishop is what?
10
             The presiding bishop is the leader of the
        Α.
11
   organization.
12
        Q.
             So would it be fair to say he is the head guy?
13
                 MR. JETER: Objection, form.
14
             Over the organization, yes.
        Α.
15
        Q.
             (By Mr. Ronald Spriggs) Okay. Is he the one
16
   that sets the policies and --
17
             He is the presiding bishop. There is a general
18
   board of 12 men. The policy is he is the head -- he is
   one of the 12. The policies for the church is set by
19
20
   the general assembly, which is the legislative body of
21
   the church.
                 And --
22
             Is he in charge of them also?
        Q.
23
        Α.
             No, sir. There is three separate bodies in the
```

church, sort of like the US Government. You have the

legislative, you have the executive, and you have the

24

```
1
   judicial, three separate branches.
2
        Q.
             Uh-huh.
                      So the church has three separate
   branches?
 3
        Α.
             It does, sir. The general assembly is the --
 4
5
   the general assembly is the authoritative body of the
   whole church, which consists of credential holders, and
6
7
   so it is like the legislature. So it is like whoever is
8
   registered for the general assembly, that is the general
9
   assembly.
        Q.
10
             Okay.
11
             That's the voice of the church.
        Α.
12
        Q.
             General assembly, that is when everybody comes
13
   in in April?
14
        Α.
             Yes, sir.
15
             That's the April Call?
        Q.
        Α.
             Yes, sir.
16
17
             And where is the last place you-all had that
        Q.
18
   meeting at, the April Call?
19
        Α.
             In Memphis.
20
             Where at in Memphis?
        Q.
21
        Α.
             At the headquarters.
22
        Q.
             Is that where the headquarters is at, in
23
   Memphis?
24
        Α.
             Yes, sir.
```

Do you recall how many people attended?

25

Q.

```
1
             No, sir. No, sir, I don't.
        Α.
 2
        Q.
             Do you-all have anything like a big auditorium
 3
   or --
 4
        Α.
             Yeah, it was at the headquarters. It is a
   building, the headquarters building.
 5
 6
        Q.
             I am going to ask you just to take a guess.
 7
   How many people do you think attended?
 8
        Α.
             Maybe 2,000.
 9
        Q.
             And you-all have branches all over the world;
10
    is that correct?
11
        Α.
             Branches, what do you mean?
             You-all have churches?
12
        Q.
13
             Local churches?
        Α.
14
        Q.
             Yes.
15
             Yes, sir.
        Α.
16
        Q.
             How many different countries do you-all have
17
    churches in?
18
        Α.
             82 plus.
             82 plus?
19
        Q.
20
        Α.
             Yes, sir.
21
        Q.
             And Bishop Blake is the presiding bishop of all
22
   of those churches, correct?
```

Q. Let me ask you about a rumor. There is rumor that have you a personal relationship with Bishop Blake?

23

24

25

Α.

That is correct.

A. No, sir.

1

2

3

4

5

6

- Q. That's not true?
- A. No, sir, I have never been in a private room with Bishop Blake ever.
 - Q. Okay. You have never -- I am just going to come out and ask you this: Do you understand the rumor I am talking about, or do you need me to say it plain --
- 8 A. Any rumors I don't know, so would you like to 9 elaborate to make sure I answer your question?
- 10 Q. Yes, sir, okay. Let me ask you this: There is
 11 a rumor that you have had a sexual relationship with
 12 Bishop Blake?
- 13 A. Never.
- 14 Q. That is not true?
- 15 | A. Never.
- Q. And by sexual relationship you understand what I am saying?
- 18 A. Never. Yes, sir.
- 19 Q. Okay. And you are saying it never happened?
- A. That's correct. I have never -- and I am going
 to go on record, I have never had a sexual relationship
 with Bishop Charles Edward Blake, Sr.
- Q. Talking about relationships, have you had sexual relationships with women in the congregation of the Church of God in Christ?

1 Α. Well, my wife is in the Church of God in Christ 2 so, yes. 3 Q. You met her there? 4 Α. Yes, sir. How old was she when you first met her? 5 Q. 6 We are the same age, so we would have been 30 7 at the time. 8 Q. Anyone else? 9 Α. I don't -- I mean I don't know. I don't know 10 what that has to do with my finances, but I --11 I tell you what I will do -- Let's do this 12 right, because we have been going about an hour, I 13 Let's go ahead and take a five-minute break, and think. 14 we will come back and continue that line of questioning. 15 (Recess from 1:50 to 2:04.) 16 Q. (By Mr. Ronald Spriggs) Let me ask you: 17 now there is a \$700,000 judgment against you; do you 18 understand that? 19 Α. Yes, sir. 20 Are you going to pay that judgment? 21 Α. I have no idea. I mean I was not prepared for 22 that, and I think that I shouldn't have to pay it. 23 Q. But you know it is a legally binding judgment? Do you understand that? 24

Now that you tell me, yes.

25

```
1
        Q.
             I mean you haven't looked at it?
        Α.
2
             I have looked at it.
             Do you still have Ms. Vicky Curry; does she
 3
        Q.
4
   still represent you?
5
        Α.
             Vicky Curry?
                           No.
6
        Q.
             Is that your lawyer from Seattle?
7
             Vicky Curry was a lawyer representing me for
   the church matters.
8
9
        Q.
             Okay. Ms. Pollard filed a complaint against
10
   you; is that correct?
11
             That's correct. I am sorry. I am sorry.
        Α.
12
   Could you -- I mean I am assuming you are asking in
13
    regards to the church or with the civil?
14
        Q.
             Yes.
15
        Α.
             Okay.
16
        Q.
             In regards to the church, she filed a complaint
17
   with the church, and it went before the board?
18
        Α.
             Yes.
19
        Q.
             Was it before the Board of Bishops, Church of
20
   God in Christ, Incorporated, Chairman Bishop John H.
21
   Sheard?
22
        Α.
             Yes.
             He was chairman of that committee?
23
        Q.
24
             I am sorry?
        Α.
```

He was the chairman of that committee?

25

Q.

```
1 A. He is the chairman of the board of bishops.
```

- Q. Board of bishops, okay. So Blake now -- Blake is the type of bishop -- where does John Sheard fit in at?
- 5 A. Over the board of bishops.
- Q. Okay. And you got a copy of their findings and everything?
- 8 A. Yes.

- Q. Okay. It says here -- They represent a picture of you, allegedly you. Is this you in this picture?
- 11 A. It is not clear to me. I can't tell.
- 12 Q. So you can't say?
- 13 A. I can't say that that is --
- 14 Q. Did you take a picture like that?
- A. No, sir, I wouldn't take any pictures like
- 16 that.
- 17 Q. Is this you?
- 18 A. I don't take pictures of myself.
- 19 Q. Is that a picture of you?
- 20 A. I can't tell.
- Q. Did you take a picture like that?
- 22 A. No, sir.
- Q. Did you allow somebody else to take a picture
- 24 of you like that?
- 25 A. No, sir.

1 Q. So you don't believe you took pictures of you? 2 Α. I cannot tell. 3 Q. Have you ever seen them before? Yes, sir. 4 Α. 5 Q. Have you acknowledged that that is you to anybody? 6 7 Α. No. sir. 8 Q. If somebody stated that that was you in this 9 picture, would they be telling the truth? 10 It would be their opinion. Α. 11 Q. Here is these pictures right here. Those are a lot clearer, aren't they? 12 No, they are not. I can't -- there is no face 13 Α. on that so --14 15 Q. That is your body there, isn't it? 16 I normally wouldn't look like that. I wouldn't Α. 17 take any pictures like that. Yeah, but is that you, though? 18 Q. I don't know. 19 Α. 20 Q. Is that your body? 21 I can't answer that. I don't know. Α. 22 Q. Okay. Are you aware, too, that there was a

CATHY SOSEBEE & ASSOCIATES * LUBBOCK, TX * 806-763-0036

video posted on the internet of two men engaging in sex,

and it is purported to be you and Mr. Blake? Have you

23

24

25

ever seen that video?

- A. I have not seen the video.
 - Q. Have you heard about that video?
 - A. Yes, I have heard about the video.
- Q. And now you are under oath here. Are you telling -- are you still maintaining that you have never engaged in any type of sexual activities with Bishop
- 7 | Blake?

2

3

4

5

6

8

12

13

14

16

17

18

19

20

21

- A. That is absolutely correct.
- 9 Q. So if we were to produce that video, would that 10 video be incorrect?
- 11 A. Yes, sir, that video would be very incorrect.
 - Q. But you know there is a saying now about videos and cameras: The big eye in the sky don't lie. And if it is on video --
- 15 A. The video would be incorrect.
 - Q. Okay. When you filed your motion for default judgment and you gave an excuse here of why you got a default judgment, Judge Mary Lou Robinson says that your excuse was not credible. Do you understand that?
 - A. That's on the paper, yes.
 - Q. So in a sense she is saying you are not credible?
- A. She is saying I am not credible?
- Q. Your excuse, you are the one who gave the excuse, right?

```
Yes, sir.
 1
        Α.
2
        Q.
            Okay. I mean an excuse is just some words.
                                                           Ιt
 3
   is the person who is giving to its credibility is the
   one who is being challenged, isn't it?
 4
                 MR. JETER: Objection, form.
5
6
                 MR. RONALD SPRIGGS: What is your
7
   objection?
8
                 MR. JETER: You are just harassing this
9
   witness now.
10
                 MR. LEVI SPRIGGS: Do you represent this
11
   witness?
12
                 MR. JETER: I don't know who you are and
13
   why you are talking on the record. You are not part of
14
   the deposition.
15
                 MR. LEVI SPRIGGS: Do you represent this
16
   witness?
17
                 MR. JETER: I don't, but you don't have to
18
   represent a witness to give a deposition objection. You
   don't have to.
19
20
                 THE WITNESS: I think it is irrelevant.
21
                 MR. RONALD SPRIGGS: If you don't represent
   him, you can't sit here and defend him if you don't
22
23
   represent him.
24
                 MR, JETER: I am not defending him.
                 MR. RONALD SPRIGGS: That's what you are
25
```

```
1
   doing, you are trying to do.
2
                 MR. JETER: I am not. I am making an
3
   objection to protect my record, and I am perfectly
   entitled under the rules to do that.
4
5
                 MR. RONALD SPRIGGS: No, you are not. You
6
   don't represent him.
7
                 MR. JETER: What rule says you have to
8
   represent someone at a deposition to make an objection
   at a deposition? Where is that rule in the Federal
10
   Rules of Civil Procedure?
11
                 MR. RONALD SPRIGGS: I don't have my book
12
   with me.
13
                 MR. JETER: Because it is not in there.
14
                 MR. RONALD SPRIGGS: We'll see.
                 MR. LEVI SPRIGGS: Is there a rule that
15
16
   says you can?
17
                 MR. JETER: That I am -- absolutely there
18
   are rules that say I --
                 MR. LEVI SPRIGGS: What rule is that?
19
                 MR. JETER: Give me the book. I will show
20
21
   you.
                 MR. LEVI SPRIGGS: You don't have the book
22
23
   either.
            Let's go on. Let's go on.
             (By Mr. Ronald Spriggs) Mr. Jones, do you feel
24
        Q.
25
   as though you are being harassed?
```

- Α. Yes, sir.
- 2 Q. You do?

3

4

5

6

7

8

10

11

12

- Α. Because I think it is irrelevant. This is supposed to be a post deposition judgment.
 - Q. Uh-huh.
- Α. So this is totally irrelevant. I mean a sexual relationship, which is certainly not true, between Bishop Blake and I, that is totally irrelevant to the post judgment deposition.
- Q. Now, anybody you have a relationship with, especially a sexual relationship, could be a place where you could hide money, couldn't it?
- 13 No, I wouldn't know that because I don't -- I 14 wouldn't know anything about that, no.
- 15 Q. Okay. So you don't know anything about that, 16 but that is why I have to ask you those questions.
- 17 Anybody you could have a relationship with is where you 18 could have assets?
- 19 I have never -- I don't know that. I am -- I Α. 20 pastor a church.
- Q. Let me ask you this right here. Ms. Cruz or 22 Ms. Curry, did you pay her?
- 23 Α. No. sir.
- 24 Q. Or did the church pay her?
- 25 Α. I did not pay her.

- Q. Okay. Is she a part of the church?A. Yes.
 - Q. This lady that you rent your house --
 - A. She is part of the Church of God in Christ, but she is not part of the organization, if that is the direction you are going. She is a member of the Church of God in Christ. Let me just say that.
- Q. Okay. Now, this lady who you rent your house from, Ms. -- I've got her name here somewhere.
- 10 A. Parmar.
- 11 Q. Parmar. Is she a part of the church also?
- 12 A. No.

4

5

6

- 13 Q. She is not a member or anything?
- 14 A. No.
- Q. Okay. Now, also in vehicles, don't you have a couple of vehicles that you lease?
- 17 A. I don't lease any vehicles. The church leases 18 a vehicle.
- 19 Q. Why? Why do they do that?
- 20 A. Transportation.
- 21 Q. Who authorizes it?
- 22 A. The board of trustees.
- Q. And who uses that vehicle?
- A. Anything that pertains to the church, not just any particular -- one particular individual.

1 Q. How many vehicles at your church do they lease? 2 Α. Just one. 3 And what kind do they lease? Q. 4 Α. It is a Lincoln Navigator. 5 Q. Do you use it? 6 I do use it. I drive it. Α. 7 Q. Isn't that a benefit? 8 Not to me, to the church. Α. 9 Q. So you get to use it; it is not a benefit to 10 you? 11 No, it is a benefit to the church. Α. 12 Q. And that is the only vehicle that they lease is 13 the one, the Lincoln Navigator? 14 Yes. Α. Earlier before we broke we were talking about 15 Q. 16 women that you dated and that you met through the 17 church. You said now you had a -- you met your wife 18 through the church, and you met Bynae's mother, Krissia, 19 you met her through the church? 20 No, I met her at a church, not through the A. 21 church. 22 At a church function? Q. 23 Α. At a church function. I don't even think it 24 was a Church -- it wasn't a Church of God in Christ so.

It was a church function?

25

Q.

- 1 It was a church function. Α. 2 Q. It wasn't God in Christ Church function? 3 Α. No, sir. 4 Q. Anybody else that you had relationships with that was a member of the church? 5 6 What do you mean "relationships"? Α. 7 Q. Any type of sexual relationship. 8 Α. No. Did you -- didn't you have a sexual 9 Q. 10 relationship with Kimberly Pollard? 11 Α. No. 12 Q. You didn't have a sexual relationship with her; 13 is that what you are telling me? 14 We were friends. Α. 15 I know, but I am asking you a question, and if Q. 16 you don't understand the question I will try to rephrase it for you. 17 18 Α. Yes, yes. 19 Q. So you did have a sexual relationship with her? 20 Yes. Α.
- Q. For a number of years?
- 22 A. No.
- Q. How long did it last?
- A. I think it was sporadic, maybe one year or two years at the most.

```
1
        Q.
             One or two years?
 2
        Α.
             Yes, sir, 2014.
 3
        Q.
             2014 to when?
        Α.
             2016.
 4
 5
        Q.
             Was -- she was a member at the church all
 6
   during that period, wasn't she?
 7
        Α.
             No.
             Now, when you went before the board of bishops,
 8
        Q.
   did you plead true to allegations 1, 2 and 4?
             May I read them, please?
10
        Α.
11
             Yes, sir.
        Q.
12
             I did not plead guilty. I invoked rule 7.
        Α.
13
             I mean did you plead true to those?
        Q.
14
             I didn't plead -- I never entered a plea to
        Α.
15
   anything. I invoked a rule.
16
        Q.
             Did the committee actually find that you had
   broken the rules?
17
             That is their conclusion.
18
        Α.
19
             Did you agree with them on any of their points?
        Q.
20
             No, I didn't.
        Α.
21
        Q.
             They did find that you had broken the rules.
22
   What sanctions did you get?
23
             I was suspended for a year.
        Α.
24
        Q.
             Did you get -- was that without pay?
             That's correct.
25
        Α.
```

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

```
I am going to mark as Plaintiff's Exhibit
    Q.
Number 1. I am going to hand you this right here and
let you look at it for a second.
             (Deposition Exhibit 1, attached.)
         (By Mr. Ronald Spriggs) Make sure that is a
    Q.
true and accurate copy of the report provided by the
board.
             Do you agree with me, that is a true and
accurate copy?
         Yes, it is. I mean this is the copy you gave
    Α.
    I would need to look at mine and see if it is the
same one, so I am assuming --
    Q.
         Okay. But you don't see where that has been
changed or altered in any fashion or form, do you?
         I wouldn't know because I don't -- I would have
    Α.
to compare copies.
         You want to compare it word for word?
    Q.
         I mean you asked me that so.
    Α.
    Q.
         That's fine, yes, I did. What I am saying
right now is, since you don't have your copy here to sit
down and compare word for word, which you will have the
opportunity to once you get your deposition, at that
point in time, if you believe that it is not the same as
yours, you can make that notation in your deposition.
    Α.
         Okay.
```

```
1
        Q.
             Is that fair?
2
        Α.
             Yes, sir.
 3
        Q.
             Okay. I am going to end this right here and
   give this to her right here as Plaintiff's Exhibit
4
5
   Number 1.
6
                 And earlier I talked about that motion to
7
   deny -- the motion to set aside the default judgment
8
   where the judge talked about credibility. Do you have a
9
   copy of this right here? Have you seen that before?
10
        Α.
             I have seen this copy before.
11
        Q.
             Does that appear to be a true and accurate
12
   copy?
13
        Α.
            Yes.
14
        Q.
             Okay. And once again, you will get a copy of
15
   this right here that you can look through when you get
16
   your deposition back, and then if you want to compare it
17
   word for word you can do that, and if you see any
18
   discrepancies you can mark those in your deposition
19
          Is that fair enough?
   also.
20
        Α.
            Yes, sir.
21
        Q.
             Okay. I am giving it to the court reporter
22
          That is Plaintiff's Exhibit Number 2.
                  (Deposition Exhibit 2, attached.)
23
24
             (By Mr. Ronald Spriggs) I know it's sort of
        Q.
25
   jumping around, but back to your compensation. You get
```

```
1
   $2,600 a month for running your church on Lomas; is that
2
   correct?
3
        Α.
            That's correct.
             And that is all the money you get from the
4
        Q.
5
   church?
6
        Α.
             That's correct. Well, was. I mean during
7
   suspension I haven't received anything so --
8
        Q.
             So you were suspended for one year without pay.
   When did that start?
10
             November, but actually the without pay -- let
11
   me go back and correct. Again, when we moved to the
12
   building, that was sporadic in the first place.
                                                       So
13
   probably being without pay probably for the last two
14
   years at the church.
15
        Q.
             Last two years you have been working without
16
   pay?
17
             That's correct.
        Α.
18
             So how have you been paying your rent, $2,600 a
        Q.
19
   month?
             Rosalind's compensation, just any help that I
20
        Α.
21
   can get here and there.
22
        Q.
             So who has been helping you?
```

Q. What money do you have saved here and there?

and so that is how I was able to do it.

I mean I had some money saved here and there,

23

24

25

```
1
        Α.
             I mean I don't have any now, but I mean that is
 2
   how we normally got through it, but usually through
3
   her --
 4
        Q.
             Now, so who helped you then?
5
        Α.
             I mean I really don't -- I mean random people I
6
   know, no names. Sometime it is just here and there
7
   so --
8
        0.
             Tell me about the here and there.
9
        Α.
             I mean somebody may walk up and give me $50,
   $100, things like that.
10
11
        Q.
             People from the church?
12
             Church, community.
        Α.
13
        Q.
             Did you report that as income?
14
        Α.
             No, it is not income.
15
        Q.
             So you didn't report that as income?
16
             It is not income, no.
        Α.
17
        Q.
             What is income to you?
18
        Α.
             Income would be from a -- would be a paid
   stipend or a set amount from -- I am sorry, go ahead.
19
20
        Q.
             Go ahead. Go ahead. Sorry about that.
21
             Income would be a paid amount set from maybe
        Α.
22
   the organization or a business.
23
        Q.
             How much money did you receive that is not
24
   income?
```

I don't know. Very little, very minimum.

25

- Q. Now, where did you have this money saved that you had saved?
 - A. Just in my pockets at home, not even in the bank. There might have been some in the bank but not -- I mean it wasn't even significant enough to pay rent, so I mean I may have got a hundred dollars a month here or \$75 a month here, something like that. It was not anything significant.
 - Q. It was money you had saved?

4

5

6

7

8

9

- A. No, money that I got, and I just held onto it,
 11 you know, pocket change.
- Q. So since November of, what, 2014 when they stopped paying you?
- A. Maybe even longer than that, maybe -- you know,
 the mortgage was the main focus.
- Q. Right. You know for a fact, though, that as of November '14 they stopped paying you, and it could have been longer?
 - A. That's correct.
- Q. Okay. And since then -- but you still continue 21 to work?
- A. That's correct. I started out that way so that
 is not a -- it is not -- I am not breaking any patterns
 in establishing a routine. I started out pastoring that
 way.

```
1
        Q.
             Did somebody take over your duties?
 2
             The church itself.
        Α.
 3
        Q.
             Okay. Did they appoint an individual to come
   and be bishop over the State of New Mexico?
 4
 5
        Α.
             No, they did not appoint anyone.
        Q.
             Who took over your duties then?
 6
 7
        Α.
             The church did. Bishop Macklin, he was
8
   assigned.
        Q.
             Macklin?
9
             Yes, sir.
10
        Α.
11
        Q.
             L-Y-N, Macklin?
             M-A-C-K-L-I-N.
12
        Α.
             AND where is he from? Is he from the home
13
        Q.
14
   office?
15
        Α.
             Yes, sir.
16
        Q.
             Did he come out and stay in New Mexico?
17
        Α.
             No.
             He would just make trips out?
18
        Q.
19
        A.
             Yes.
20
        Q.
             And did he do the job that you were doing?
21
        Α.
             Yes.
22
        Q.
             Did you see him very much?
23
        Α.
             I am sorry?
24
                  MR. RONALD SPRIGGS: What was the question,
   ma'am?
25
```

```
1
                  (Last question read by the reporter.)
2
             Not really.
        Α.
 3
        Q.
             (By Mr. Ronald Spriggs) Did the rent stop
 4
   getting paid during your current suspension?
             Yes.
5
        A.
6
        Q.
             And that came -- that became your
7
   responsibility to pay it instead of the church's?
             Became, yeah, mine and Rosalind's
8
        Α.
9
   responsibility.
             And you say Rosalind is a substitute teacher?
10
        Q.
11
        Α.
             Yes.
12
        Q.
             And substitute teachers, they don't work all
13
   the time; is that right?
14
        Α.
             That's correct, but she had long-term
15
   assignments, though.
16
        Q.
             So she was a permanent substitute?
17
             That's correct.
        Α.
18
        Q.
             How much does she make a month?
19
        Α.
             I don't know. I don't know what her income is.
20
   I just depend on her to pay the bills.
21
        Q.
             What all bills does she pay?
22
             All the bills that were normally being paid, I
        Α.
23
   guess the home bills, utilities and the rent.
24
             Utilities and the rent she pays?
        Q.
25
        Α.
             Yes, sir.
```

```
1
        Q.
             Did she work at one specific school?
2
        Α.
             No.
 3
        Q.
             You say she had some long-term assignments?
        Α.
             Long-term assignments.
 4
             Where was those long-term assignments at?
 5
        Q.
             One was at La Cueva, one was at Del Norte,
 6
        Α.
 7
   currently now Albuquerque High. So she will be shifting
8
   probably based on the assignment.
             She is at Del Norte now?
9
        Q.
10
        Α.
             Albuquerque High.
11
        Q.
             Albuquerque High?
12
        Α.
             That's correct.
13
        Q.
             How long has she been there?
             Since the beginning of school. I am not sure
14
        Α.
15
   when it started, maybe two weeks now.
        Q.
16
             About two weeks ago?
             That's correct.
17
        Α.
             She makes enough to pay the bills at the house,
18
        Q.
19
   the rent and the utilities?
20
        Α.
             That's correct.
             And right now you don't know how much she
21
        Q.
22
   makes?
23
             I don't.
        Α.
24
             Does she deposit -- she is on automatic
        Q.
25
   deposit, right?
```

- A. I don't know. I don't think so.
- Q. The account that you have, you don't see when they deposit her check?
 - A. She has her own separate account.
- Q. Oh, in addition to this savings and checking account, she has an additional account?
- 7 A. She has an account.

- Q. Where is her account at?
- 9 A. I wouldn't know. It may be at Nusenda. I 10 wouldn't know. It is possible.
- 11 Q. You don't know that? Can you find out that 12 information?
- 13 A. I guess I can.
- 14 Q. Do you -- this account that she has --
- 15 A. I am not a signer on it. I don't know. I 16 don't have any information.
- Q. You are not a signer on the account? Does she just have a checking account, or is it checking and savings?
- 20 A. I don't know.
- Q. And you can find that out, though, right?
- A. To the best of my ability.
- Q. She is currently your wife; she has been your wife, correct?
- 25 A. Correct.

```
1
        Q.
             She understands that you have this judgment
2
   against you?
3
        Α.
             Yes.
        Q.
             All you would have to do is ask her about her
 4
5
   finances, couldn't you?
 6
        Α.
             I am not required to.
 7
        Q.
             You are not required to? Isn't it half yours?
 8
        Α.
             No, I never claimed it so, no.
 9
        Q.
             But you-all are married?
10
        Α.
             That's correct.
11
             And this is money that is earned during the
        Q.
12
   course of the marriage?
13
        Α.
             Yes.
             And she has used that money for the benefit of
14
        Q.
   both of you-all?
15
16
        Α.
             Yes.
17
             Now, when will your suspension be up?
        Q.
             November, December maybe, the end of the year,
18
        Α.
19
   November, December.
20
             Of two thousand what?
        Q.
21
        Α.
             '17.
22
        Q.
             Are you guaranteed your job back?
23
        Α.
            Yes, sir.
24
             Now, when you were working there and doing your
        Q.
25
   regular work as bishop in the State of New Mexico, you
```

```
1
   never received any type of compensation from any of the
2
   local churches?
 3
        Α.
             No, I did not from no local churches.
        Q.
 4
             The only church you received compensation from
 5
   was the ones that is on Lomas?
 6
        Α.
             That's correct.
 7
        Q.
             That was the one -- it was the one on Lomas
8
   that paid you $2,600 a month; is that correct?
 9
        Α.
             That's correct.
10
        Q.
             How much would that church on Lomas make in a
11
   month, an average month?
12
        Α.
             Now?
13
             When you were back working.
        Q.
14
        Α.
             About 10,000.
15
        Q.
             10,000 a month?
             That's correct, 10, 10 to 12,000. The mortgage
16
        Α.
17
   was 10,000 so --
18
             Mortgage was 10,000?
        Q.
19
        Α.
             That's correct.
20
        Q.
             How much did they pay for that building?
             How much did they pay for the building?
21
        Α.
             Yeah, what was the selling price on the
22
        Q.
23
    building when they bought it?
24
        Α.
             The selling price, I believe it was 2.4
25
   million.
```

```
1
        Q.
             Did they make a down payment on it?
2
        Α.
             No.
 3
        Q.
             Did you sell the old building on Second Street?
        Α.
             Yes.
 4
             What was that sold for?
 5
        Q.
 6
        Α.
             I believe -- I believe 450,000. I believe
7
   that's correct.
8
        Q.
             You say you believe it was 450,000?
9
        Α.
             Yes, sir.
10
        Q.
             Did you-all own that building outright when
11
   you-all sold it?
12
        Α.
             Yes.
13
        Q.
             So that 450,000 came to the church?
14
        Α.
             No.
15
        Q.
             Where did it go?
16
        Α.
             To the mortgage.
17
        Q.
             So is that the money you put down on the new
18
   building?
             It wasn't money put down. The finance company
19
        Α.
   was the owner of the building once we moved to 1400.
20
21
   signed the deed over to the finance company.
             For the new building on Lomas?
22
        0.
23
             Yes, sir.
        Α.
24
             So let me make sure I have this straight.
        Q.
25
   you had a finance company that financed the new building
```

```
on Lomas?
1
2
             That's correct.
        Α.
 3
        Q.
             And the old building on Second Street, you
   basically -- well, you signed that over to them, the
 4
5
   mortgage company?
6
        Α.
             That's correct. That's correct.
7
        Q.
             So in essence you put down the building on
8
   Second Street for the building on Lomas?
9
             No, they became the owners. There was no money
   put down. They became the owner, so when the building
10
11
   sold, it was sold for the finance company which church
12
   finance.
             So then the church got a credit then of
13
        Q.
14
   $450,000 if that's what it sold for?
15
             That's correct.
        Α.
             So then in actuality the church put down that
16
        Q.
17
   building in which --
18
        Α.
             No, we didn't put anything down. No cash --
19
             Which ultimately led to $450,000 being put
        Q.
20
   down?
21
        Α.
             No.
22
        Q.
             Or being given to the finance company?
             No, that is not how that work. Let me correct
23
        Α.
                                                  When we
24
   that. Let me make sure I am clear on that.
```

bought the 4800 Lomas building, we no longer owned the

```
1
   rights to 1120. So whatever it became whatever -- I
2
   don't know how even the mathematics work, but whatever,
3
   when the building sold, that was a transaction that was
4
   between the title company and finance company. I am not
5
   sure if it even affected us any or not.
6
        Q.
             And do you actually know what credit the
   finance company gave you for the building on Second
7
   Street?
8
             None, zero.
        Α.
        Q.
             So then you are telling us that you-all owned
10
11
   the building outright on Second Street?
12
        Α.
             That's correct.
        Q.
            And you signed it over to the finance company?
13
14
        A.
             That's correct.
15
        Q.
             And you-all didn't get any credit for signing
16
   it over to the finance company?
        Α.
17
             Not that I know of, no.
18
             So you just gave them the building?
        Q.
19
             That's correct, 100 percent financing.
        Α.
20
        Q.
             Do you know why they just gave them a building
   that is -- gave the finance company a building that was
21
22
   worth $450,000?
             Well, we were buying a building for 2.4 so --
23
        Α.
```

But you-all didn't get any credit for that?

The rule was you couldn't own two buildings at

24

25

Q.

Α.

```
the same time so --
 1
 2
        Q.
             So you-all just gave them a building of
   $450,000?
 3
        Α.
             That's correct.
 4
        Q.
 5
             Okay. And you are sure of that?
             Yes, sir, I am.
 6
        Α.
7
        Q.
             Do you remember which finance company it was?
 8
        Α.
             Church Finance.
9
             Where are they out of?
        Q.
10
        Α.
             Right there in Albuquerque.
11
        Q.
             Albuquerque?
12
        Α.
             That's correct.
13
        Q.
             They finance a lot of churches?
14
             I don't know.
        Α.
15
        Q.
             Have you-all dealt with them before?
16
        Α.
             Just this time.
17
             So you don't know of any other deals with this
        Q.
18
   finance company?
19
        Α.
             I don't know.
20
             So if they were paying you $2,600 a month, and
        Q.
21
   the mortgage was 10,000, they collected a lot more than
22
   10 to $12,000, didn't they?
23
             No, sir. I think I said I stopped receiving
        Α.
24
   stipend when we moved to 4800 Lomas.
```

When was that?

25

Q.

Okay.

- Α. 2013. 1 2 Q. 2013? 3 Α. That's correct. Q. 4 Even if they were bringing in \$12,000 a month 5 and they were paying you 2,600, that would be a deficit there because they can't pay the mortgage? 6 7 Α. Okay. So I think I repeated -- I mean I am repeating again. I stopped receiving a stipend in 2013 8 when we moved to 4800 Lomas. 10 Q. Because they stopped compensating you altogether? 11 Α. That's correct, because there was nothing to --12 there was a deficit. 13 Q. Why did they stop paying you? 14 There was deficit, I mean the mortgage became Α. the prime focus of the finances. 15 16 Q. So since 2013 you were working for free? 17 Α. Pretty much free, yes. 18 Q. The church wasn't paying you at all? 19 Α. No. Did you ever ask for any money? 20 Q. 21 Α. No, I didn't.
- Q. You just accepted that the way it was?
- 23 A. Yes.
- Q. So you are going to dedicate your life to just working for free?

- 1 A. I started out that way in 1995.
- 2 Q. Back in '95 you didn't have a wife, did you?
- 3 A. No.

- 4 Q. It was just you?
- 5 A. That's correct.
- Q. So back then you worked for free, and it was just you?
 - A. We had other bills to pay, and that is all.
- Q. Okay. And so you are saying your relationship
 to Kimberly Pollard went for about one to two years from
 about 2014 to about 2016?
- 12 A. You said -- you asked -- I think you asked 13 earlier, I think you said sexual relationship.
- 14 Q. Yes.
- 15 A. Okay.
- Q. Sexual relationship, okay, lasted for one to two years? You gave me dates, about 2014 to 2016?
- 18 A. That's correct.
- 19 Q. Do you have an email to a pastorJL --
- MR. RONALD SPRIGGS: Yeah, I think he said
 the did at pastorJL@AOL.com.
- THE WITNESS: I think that was one of the three I gave earlier.
- MR. RONALD SPRIGGS: That's what I thought.
- 25 That's the one he gave me earlier.

```
1
        Q.
             (By Mr. Ronald Spriggs) Do you have a Hotmail
 2
   address also -- I mean email, Kmoney-P@hotmail.com?
 3
        Α.
             Do I have that?
        Q.
             Yes. Did you ever send anything to that email
 4
   address?
 5
 6
        A.
             Not that I recall, I mean I --
 7
        Q.
             Let me show you something here. Do you
 8
   recognize that? I am showing you a phone right now with
   an email on it and has email addresses.
 9
10
        Α.
             Okay.
             Did you send emails -- did you send that email?
11
        0.
12
        Α.
             I mean that is 20 years ago. I wouldn't
   recall.
13
             I mean --
14
             Well, do you want to read it and see?
        Q.
15
        Α.
             I just don't recall. That is my email address,
   but I don't recall sending that email.
16
17
                  MR. JETER: Can I see the email?
18
                  MR. RONALD SPRIGGS: (Indicating.)
19
        Q.
             (By Mr. Ronald Spriggs) So after 2016 did you
20
   and Kimberly Pollard ever have a sexual relationship
21
   again?
22
             No.
        Α.
23
        Q.
             Did you ever send emails to Kimberly's
24
   daughter?
        Α.
25
             No.
```

```
1
        Q.
             Or texts?
 2
        Α.
             No, she don't -- no.
 3
             You don't know, or you don't remember or --
        Q.
             No.
 4
        Α.
 5
        Q.
             You never sent her an email?
 6
        Α.
             I never sent her an email.
 7
        Q.
             Never sent her a text?
 8
             Never sent her a text.
        Α.
 9
        Q.
             Any other contact?
10
             Other than through --
        Α.
11
        Q.
             Was there some type of service?
12
             Other than through Kimberly, I mean everything
        Α.
13
   is Kimberly's phone.
14
        Q.
             Didn't you send her a -- isn't there a service
15
   Glide?
            Did you ever send her a message through Glide?
16
        Α.
             To Kimberly, yes.
17
        Q.
             Did you ever send her daughter a message
18
   through Glide?
        Α.
19
            To Kimberly.
20
        Q.
             Is that yes, no?
21
        Α.
             I sent a Glide to Kimberly. I never sent
22
   anything directly, because her daughter didn't have a
23
   Glide number, so I don't -- I wouldn't send something to
24
   somebody that don't have anything.
25
        Q.
             Okay. Now, how does Glide work? I am not too
```

```
familiar with that.
1
2
        Α.
             I don't know. I only had it briefly, so I
   don't really know how it worked.
4
        Q.
             But you said you have got to have a Glide
5
   number?
6
        Α.
            You have a Glide number, and that's basically
7
   all I know, because I think Kim was the only one I had
   Glide with.
8
9
        Q.
             How do you get a Glide number?
10
             I don't know. She sent me a link to sign up
        Α.
   for Glide, and that's how.
11
12
        Q.
             And you just signed up for it?
13
        Α.
             I mean I clicked on the link, and I signed up.
14
        Q.
             Did it give you a number?
15
             I had to put in my phone number for it so --
        Α.
16
        Q.
             Okay. So you put your number in, and that
17
   became your Glide number; your phone number?
18
        Α.
             I believe that's correct.
19
        Q.
             And you could receive messages through that
   service?
20
21
        Α.
             I believe that's correct.
        Q.
                    Now, you only go to the home office, you
22
             Okay.
   say, in April?
23
24
        Α.
            Yes, sir, headquarters. You call it home
25
   office. It is headquarters.
```

- A. Yeah, I just want to correct, because I mean it is headquarters. I want to make sure the record is correct because it is a church building.
 - Q. That's fine; headquarters is fine.
- A. Correct, I want to make that clear.
- Q. Earlier I was referring to it as home office but headquarters. You go for the April calling, right?
- 10 A. That's correct.
- 11 Q. Do you have any other churches that is out of 12 the State of New Mexico that you supervise?
- 13 A. Out of the State of New Mexico?
- 14 Q. Yes.

4

6

7

8

- 15 A. No.
- Q. So your church, whatever, is just limited to the State of New Mexico?
- 18 A. That's correct.
- Q. And who is directly above you? Who supervises you?
- A. Bishop Blake, the general board. The general board, Bishop Blake.
- Q. Bishop Blake, does he come around to see your local churches?
- 25 A. No. Let me make that plain. The general

When is the last time you talked to him by any

25

Q.

```
type of communication, texts, emails, phone?
1
2
        Α.
            September 21st at a meeting with the general
3
   board.
            What year?
4
        Q.
5
        Α.
            2016.
            That was the last time you had a conversation
6
        Q.
   with him?
7
            It was a meeting. It wasn't even a
8
   conversation. It was a meeting, so that's the last time
10
   I had any type of --
11
        Q.
            Contact with him?
12
            That's correct.
        Α.
13
            I am almost finished up here. Let me go over
        Q.
14
   my notes here and make sure I have got everything clear.
15
   Let's take another five-minute break, and I will come
16
   back and try to finish up. Okay?
17
        Α.
            We can't finish?
            Well, I need to check my notes and make sure I
18
        Q.
19
   asked you everything. You don't want me to have to call
   you back, do you?
20
            I am here. Let's --
21
        Α.
            I know. That's why I am trying to get
22
        Q.
```

finished. Give me five minutes. That way we get it

way, I appreciate your coming over.

done, and that way you can go on your way. And by the

23

24

```
How much longer do we have?
1
        Α.
2
        Q.
             It won't be long. Let me just go over my notes
 3
   here.
                  MR. RONALD SPRIGGS: Let's go off the
 4
5
   record right now.
6
                  (Recess from 2:50 to 3:00 p.m.)
7
             (By Mr. Ronald Spriggs) The church is
        Q.
8
   incorporated, isn't it?
             Metropolitan church or which church?
9
        Α.
10
        Q.
             Church of God in Christ?
11
        Α.
             Yes.
12
        Q.
             Do you own any of the stock?
13
        Α.
             No, there is no -- no.
             Do you own any part of the church?
14
        Q.
15
        Α.
             No.
16
             Okay. They do have shares, though, don't they?
        Q.
             I don't know.
17
        Α.
18
             You are telling us here today you don't own any
        Q.
19
   of the church?
20
        Α.
             No.
21
             Now, what type -- did you have a compensation
22
   package when you weren't -- when you first went to work
23
   for the church?
```

Did you ever have a compensation package?

24

25

Α.

Q.

No.

```
1
             No.
        Α.
2
        Q.
             Are you telling us today that the only thing
 3
   you ever received from them was the $2,600 a month?
        Α.
4
             Yes.
             You never received any additional formal or
5
        Q.
6
   informal benefits?
7
        Α.
             I mean over 22 years I don't -- not that I can
8
   recall.
9
        Q.
             Now, your agreement with the church, is it in
   writing?
10
11
        Α.
             The agreement?
12
        Q.
             Yes.
13
             No.
        Α.
14
                  MR. JETER: Objection, form.
                  MR. RONALD SPRIGGS: So once again, I am
15
16
   going to object to your objection.
17
                  MR. JETER: Okay.
18
                  MR. RONALD SPRIGGS:
                                        But I forgot my
19
   question. What was my question, ma'am?
                  (Last question read by the reporter.)
20
21
        Q.
             (By Mr. Ronald Spriggs)
                                       Did you have any type
22
   of agreement in writing with the church?
23
        Α.
             No.
24
             How do you know what your authority was if
        Q.
25
   there was no agreement in writing?
```

- Certificate, certificate of appointment. Α.
- Q. That is in writing, though, right?
- 3 Α. I wouldn't consider it an agreement, though.
- It is a certificate of appointment. I guess in terms 4
- maybe you would assume it is an agreement, but I never 5
- 6 considered it being an agreement.
- 7 Q. So they gave you a certificate of appointment?
- Α. Correct. 8
 - Q. Somebody can put it up on the wall and frame?
- Α. Yeah. 10
- 11 Q. What does that say; do you recall?
- You were appointed pastor, I mean, has my name 12 Α.
- 13 and --

2

- Does it say you are in charge of the State of 14 Q.
- New Mexico? 15
- 16 Which one are you asking, because I mean Α.
- appointment as pastor or appointment as bishop? 17
- 18 Q. Oh, so you got more than one certificate?
- 19 Α. You have to be appointed to be a pastor, you
- 20 are a pastor, and not every pastor is a bishop.
- 21 Q. Every pastor is a bishop?
- 22 Every pastor is not a bishop. Α.
- 23 Q. Okay. So then you got appointed to be a
- 24 bishop?
- Correct. 25 Α.

- 1 Q. And that was your -- you got a certificate of 2 appointment?
 - Α. That's correct.
 - Q. And it just says that you are appointed to bishop?
- 6 Α. Bishop.

5

7

8

9

10

11

- Q. But how do you get the authority to be in charge of the whole State of New Mexico?
- Α. By laying hands, agreement, with the agreement with the general assembly, ratified by the general assembly, should I say. There is no -- other than the certificate, as I said.
- Has anyone ever defined your job duties? 13 Q.
- 14 Α. No.
- Q. Okay. So if no one has ever --15
- 16 Could you explain -- elaborate the question? Α.
- 17 Q. Well, normally when you get a job people tell 18 you what your job duties are.
- 19 Oh, okay. It is in the church, the church Α. manual or church book. 20
- 21 Q. You have a church book?
- 22 Α. I do.
- 23 Q. Where is that today?
- 24 Α. Probably in my bookshelf.
- Q. That's at home? You didn't bring it? 25

- A. That's correct.
- 2 Q. What documents did you bring today with you?
- 3 A. I believe I brought -- well, let's see. I have
- 4 a W-2. I have a --
- Q. May I see this?
- 6 A. Sure.

8

- 7 Q. Are these originals?
 - A. Copy. Yes, copy of the originals.
- 9 Q. I will mark these and put them in evidence if 10 you don't mind.
- 11 A. These agreements.
- Q. Okay. What I will do for the sake of -- are these originals? Do you need them back?
 - A. No, sir, those are for you.
- Q. These are for me. Well, thank you. I am going to mark these and put them in evidence. So you provided
- 17 us with a -- the credit union, that is one page.
- 18 Provided us with the Wells Fargo, provided us with the
- 19 rental lease agreement, and you provided us with W-2s
- 20 for 2016. You provided us with a rental agreement
- 21 renewal offer. I am going to go over these and mark
- 22 them. Is this everything that you brought?
- 23 A. Yes.
- Q. I am going to mark the rental lease agreement
- 25 3. It is three pages.

```
1
                  (Deposition Exhibit 3, attached.)
2
        Q.
             (By Mr. Ronald Spriggs). I am going to mark the
   credit union 4. That is one page.
3
4
                  (Deposition Exhibit 4, attached.)
5
        Q.
             (By Mr. Ronald Spriggs) Advantage Point
6
   Properties, I am going to mark that as 5. I think that
7
   is two pages.
8
                  (Deposition Exhibit 5, attached.)
        Q.
             (By Mr. Ronald Spriggs) W-2s for 2016, I am
9
   going to mark that as 6. That is one page.
10
11
                  (Deposition Exhibit 6, attached.)
12
        Q.
             (By Mr. Ronald Spriggs) Now, you have seen me
13
   do it.
            Was that all marked correctly, do you think?
14
        Α.
            Yes, sir.
15
        Q.
             That's all the documents that you brought; is
16
   that correct?
17
        Α.
             Yes, sir.
             Are you satisfied with all the answers that you
18
        Q.
19
   have given me?
20
        Α.
             Yes.
21
             Have I been mean to you in any fashion or form?
        Q.
   You are not going to answer?
22
23
            Are we finished?
        Α.
24
        Q.
             We will be finished. I need your answer,
25
   though.
```

```
1
        Α.
             I have no response.
2
             Just one other question. Have you transferred
        Q.
 3
   any property in the last three years?
 4
        Α.
             No.
 5
        Q.
             Has your wife transferred any property in the
   last three years?
6
7
        Α.
             No.
8
        Q.
             You just told me you don't own any real
   property; is that correct?
9
10
        A. Yes, sir.
11
        Q.
             Okay.
12
                 MR. RONALD SPRIGGS: I will pass the
13
   witness.
14
                 MR. JETER: Reserve --
15
                 MR. RONALD SPRIGGS: Hold on, one other
16
   thing.
           We have a video here.
             (By Mr. Ronald Spriggs) You say that -- you
17
        Q.
18
   said you never sent any type of communication to
19
   Kimberly's daughter; is that correct?
20
             To Kimberly, yes, but not directly to her
        A.
21
   daughter.
22
             What I have here is -- whose picture is this?
        Q.
23
            That is me.
        Α.
24
        Q.
             Okay. Let me play --
25
                 MR. RONALD SPRIGGS: How do you play it?
```

```
MR. LEVI SPRIGGS: Hit the train, press the
 1
 2
   train.
 3
                 MR. RONALD SPRIGGS:
                                       Here?
 4
                 MR. LEVI SPRIGGS: Go back.
 5
                 MR. RONALD SPRIGGS:
                                      Here man, come fix
6
   this.
          Technology is not my thing.
7
        Q.
             (By Mr. Ronald Spriggs) I am going to play
 8
   this?
9
                 (Recording played as follows)
10
                 MALE VOICE: I will get it to her one day
11
        or another. You can't you can't block me. You
12
        can't stop me. You can't block my flow.
13
        ma'am.
               No, ma'am. I am telling you. Tell you
14
        what God loves, and that is the truth.
                                                 That is the
15
        truth.
                That is the truth. That is the truth.
16
        you are not cheating, if you are not cheating, just
17
        not cheating, can you tell (Inaudible) that, if you
18
        are not cheating. It is not fair.
                                             That video was
19
        for her. That wasn't even for you, and you are
20
        going to listen to it. You are going to sensor me?
21
        Oh, my heart just broke. That hurt me.
22
        me. I can't get over that.
23
                 (Recording concluded)
24
             (By Mr. Ronald Spriggs) Now, was that you?
        Q.
25
        Α.
            Yes.
```

- 1 Q. And you were talking about -- who were you 2 talking to, Kimberly?
 - Α. Yes.

4

7

8

9

16

17

18

19

20

- Q. And you were talking about her daughter?
- I believe that's correct. I mean I don't even 5 Α. know the context of the Glide. 6
 - Q. And earlier you said that you had sent that message for her, so you did send a message to the daughter?
- To -- I only sent -- I only talked to 10 11 Kimberly's phone, so I don't have any information for 12 her daughter.
- 13 You were talking about you sent it for her; you Q. 14 didn't send it for -- you sent it for her; you 15 didn't send it for --
 - I don't even know the context of the message. I mean I guess I may need to listen to what Kimberly said in order for me to fairly answer that question, because I mean I only -- I am talking to Kimberly the whole time so.
- 21 But that was you, and those are your Q. 22 words, correct?
 - Α. Talking to Kimberly, yes.
- 24 Q. How many times have you talked to the young 25 girl, Kimberly's daughter?

```
I don't think I ever have, other than with
1
        Α.
2
   Kimberly.
 3
        Q.
             Let me ask you this question. We will follow
        Have you ever been investigated by the authorities
 4
   up.
5
   for talking to or sexually enticing juveniles or minors?
6
             No.
        Α.
7
        Q.
             Okay.
8
                  MR. RONALD SPRIGGS: I will pass the
9
   witness.
10
                  MR. Jeter: We will reserve our questions.
11
                  (Wells Fargo document attached.)
12
                  (Signature of the witness required.)
13
14
15
16
17
18
19
20
21
22
23
24
25
```

1	CHANGES AND SIGNATURE					
2	WITNESS NAME: JAMES LaKEITH JONES					
3	DATE OF DEPOSITION: AUGUST 30, 2017					
4	PAGE LINE CHANGE REASON					
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
İ						

1	I, JAMES LaKEITH JONES, have read the			
2	foregoing deposition and hereby affix my signature that			
3	same is true and correct, except as noted above.			
4				
5	LAMES L. KETTH JONES			
6	JAMES LaKEITH JONES			
7	THE STATE OF)			
8	COUNTY OF)			
9	Before me,, on			
10	this day personally appeared JAMES LaKEITH JONES, known			
11	to me (or proved to me under oath or through			
12) (description of identity card or			
13	other document) to be the person whose name is			
14	subscribed to the foregoing instrument and acknowledged			
15	to me that they executed the same for the purposes and			
16	consideration therein expressed.			
17	Given under my hand and seal of office this			
18	, day of			
19				
20				
21	NOTARY PUBLIC IN AND FOR			
22	THE STATE OFCOMMISSION EXPIRES:			
23	COMITION EXCITATION			
24				
25				

\$	2	5	10:22, 19:6, 19:11, 19:12, 20:19, 20:25,	81:19, 81:23, 82:4 appointment [6] -
\$100 [1] - 59:10	2 [3] - 55:9, 57:22,	5 [2] - 84:6, 84:8	21:2, 20:19, 20:25, 21:2, 21:10, 21:12,	1
\$12,000 [2] - 70:22,	57:23	509 [2] - 16:3, 16:4	1	81:1, 81:4, 81:7,
71:4			22:17, 31:21, 32:3,	81:17, 82:2
	2,000 [1] - 42:8	525 [2] - 6:8, 6:9	73:2, 73:5, 73:15	appreciate [1] - 78:25
52,600 [7] - 11:1 9,	2,600 [6] - 11:9, 12:17,	550 [1] - 25:4	addresses [3] - 32:10,	April [10] - 37:1, 39:6,
11:20, 58:1, 58:18,	12:24, 13:2, 13:7,		32:24, 73:9	39:7, 39:11, 41:13,
66:8, 70:20, 80:3	71:5	6	administrate [1] - 35:7	41:15, 41:18, 75:23
450,000 [4] - 68:14,	2.4 [2] - 66:24, 69:23		administrative [2] -	76:9, 77:24
68:19, 69:22, 70:3	20 [9] - 19:18, 23:4,	6 [2] - 84:10, 84:11		1
50 [1] - 59:9	23:6, 23:12, 23:13,	600 [1] - 13:3	14:4, 14:5	APS [1] - 17;24
		612 [1] - 92:23	Advantage [1] - 84:5	arrearage [1] - 34:1
500 [2] - 24:20, 25:16	29:12, 32:2, 33:23,		advice [2] - 20:2, 20:7	arrears [2] - 33:25
700,000 [1] - 44:17	73:12	7	affected [1] - 69:5	ascension [1] - 36:4
75 [1] - 60:7	200 [1] - 9:18	'	affix [1] - 90:2	aside [1] - 57:7
800 [1] - 13:1	2009 [3] - 24:24, 24:25	7 [1] - 55:12	age [2] - 24:10, 44:6	assembly [8] - 40:20.
	2012 [4] - 26:10,	7.50 [1] - 34:13	_	
,	26:14, 26:20, 36:15	700[1] - 13:1	ago [2] - 63:16, 73:12	41:4, 41:5, 41:8,
		I .	agree [3] - 19:2,	41:9, 41:12, 82:10,
4[1] - 60:17	2013 [6] - 9:4, 9:5,	7821 [2] - 16:5, 16:6	55:19, 56:8	82:11
17 [1] - 65:21	71:1, 71:2, 71:8,	79408 [1] ~ 92:25	agreement [12] - 80:9,	assets [3] - 24:18,
• •	71:16		80:11, 80:22, 80:25,	25:15, 51:18
91 [2] - 8:4, 8:18	2014 [5] - 55:2, 55:3,	8	3	1
95 [7] - 8:4, 8:14,	60:12, 72:11, 72:17		81:3, 81:5, 81:6,	assigned [4] - 8:16,
8:17, 8:18, 9:3, 9:4,	2016 [7] - 55:4, 72:11,	800 [1] - 13:4	82:9, 83:19, 83:20,	8:18, 34:25, 61:8
72:2	1	82 [2] - 42:18, 42:19	83:24	assignment [1] - 63:8
	72:17, 73:19, 78:5,	853 [2] - 16:1, 16:2	agreements [1] -	assignments [4] -
0	83:20, 84:9	86 [1] - 92:24	83:11	62:15, 63:3, 63:4,
V	2017 [3] - 89:3, 91:12,		ahead [5] - 19:7,	63:5
00 [1] - 92:2	92:19	87190 [1] - 19:14	44:13, 59:19, 59:20	assistant [3] - 7:11,
• •	20s [1] - 23:5			
1	21 [3] - 18:18, 23:4,	9	Alamogordo [2] -	7:18, 36:5
1	,		24:2, 24:4	associate [1] - 36:5
[5] - 19:4, 55:9, 56:2,	23:6	90 [1] - 36:2	Albuquerque [16] -	Associates [1] - 92:2
56:4, 57:5	21,200 [1] - 9:22		6:20, 7:22, 8:8, 8:14,	assume [3] - 24:10,
•	21st [1] - 78:2	Α	8:21, 10:21, 13:24,	77:21, 81:5
10 [3] - 66:16, 70:22	22 [2] - 18:18, 80:7		17:24, 19:9, 19:15,	1
10,000 [5] - 66:14,	26 [1] - 34:2	ability [1] - 64:22	1	assuming [3] - 38:24
66:15, 66:17, 66:18,	1	able [1] - 58:24	20:15, 63:7, 63:10,	45:12, 56:12
70:21	26,000 [1] - 34:2	absolutely [4] - 10:5,	63:11, 70:10, 70:11	attach [2] - 18:5.
100 [1] - 69:19	2:04 [1] - 44:15	31:19, 48:8, 50:17	allegations [1] - 55:9	18:22
10525 [2] - 10:23,	2:16-CV-238-J [1] -		alleged [4] - 26:13,	attached [6] - 56:4,
	91:6	accepted [1] - 71:22	26:16, 26:19, 26:20	57:23, 84:1, 84:4,
10:24	2:50 [1] - 79:6	account [25] - 14:13,	allegedly [1] - 46:10	
11,000 [1] - 9:21		15:6, 15:7, 15:9,	1	84:8, 84:11
11,500 [1] - 9:22		15:10, 15:12, 15:15,	allow [1] - 46:23	attend [1] - 36:1
1120 [3] - 8:23, 26:5,	3	16:8, 16:9, 16:10,	allowance [1] - 11:18	attended [4] - 9:10,
69:1	3 [2] - 83:25, 84:1	16:18, 16:21, 17:7,	allowed[1] - 27:14	10:4, 41:25, 42:7
			almost [1] - 78:13	attorney [1] - 91:22
11th [1] - 92:19	30 [3] - 44:6, 89:3,	17:8, 17:14, 20:22,	altered [1] - 56:14	
12 [2] = 40:18, 40:19	91:12	64:2, 64:4, 64:6,	* *	attorneys [1] - 92:16
2,000 [1] - 66:16	30,000 [1] ~ 34:3	64:7, 64:8, 64:14,	altogether[1] - 71:10	auditorium [1] - 42:2
1 2.2 [1] - 29:13	30104[2] - 19:12,	64:17, 64:18	AMARILLO [1] - 91:2	AUGUST [2] - 89:3,
2/31/18 [1] - 92:23	19:14	accounts [5] - 14:11,	amount [5] - 12:20,	91:12
1 39 [2] - 15:19, 15:20	3:00 [1] - 79:6	14:23, 15:4, 15:15,	59:19, 59:21, 91:24	authoritative [1] - 41:
• • • • • • • • • • • • • • • • • • • •		15:24	AN [1] - 91;7	authorities [1] - 88:4
1400 [1] - 67:20	3rd [1] + 29:12		AND [6] - 61:13, 89:1,	authority [2] - 80:24,
142 [1] - 34:7		accurate [3] - 56:6,	1	?
14th [1] - 30:23	j 4	56:9, 57:11	90:21, 91:3, 91:8,	82:7
15-3797 [1] - 6:10	Asa 24:10 EF:0	acknowledged [2] -	91:9	authorizes [1] - 52:21
150 [1] - 9:15	4 [4] - 34:12, 55:9,	47:5, 90:14	answer [8] - 37:23,	automatic [1] - 63:24
	84:3, 84:4	ACTION [1] - 91:5	38:6, 43:9, 47:21,	autonomous [1] -
5th [1] - 12:7	4/20/2022[1] - 6:1		77:2, 84:22, 84:24,	37:16
16 [1] - 29:12	40 [1] - 34:14	action [2] - 92:16,	87:18	
600 m 45.04 45.00	440 [1] - 25:5	92:18	1	average [2] - 12:25,
1030 [2] - 15:21, 15:22		ACTIVE [1] - 91:7	answers [1] - 84:18	66:11
		activities [1] - 48:6	anyplace [1] - 25:12	aware [1] - 47:22
1989 [1] - 7:7	450,000 [3] - 67:6,	ACTAILES III - 40.0	I	1
1989 [1] - 7:7 1995 [5] - 8:1, 8:6,	450,000 [3] - 67:6, 67:8, 67:13		appear[1] - 57:11	
1630 [2] - 15:21, 15:22 1989 [1] - 7:7 1995 [5] - 8:1, 8:6, 8:19, 72:1	1	actuality [1] - 68:16	1	D
1989 [1] - 7:7 1995 [5] - 8:1, 8:6,	67:8, 67:13 4800 [5] - 9:3, 9:5,	actuality [1] - 68:16 addition [1] - 64:5	appeared [1] - 90:10	В
1989 _[1] - 7:7 1995 _[5] - 8:1, 8:6, 8:19, 72:1	67:8, 67:13	actuality [1] - 68:16	appeared [1] - 90:10 appoint [4] - 35:6,	
1989 _[1] - 7:7 1995 _[5] - 8:1, 8:6, 8:19, 72:1 1:50 _[1] - 44:15	67:8, 67:13 4800 [5] - 9:3, 9:5,	actuality [1] - 68:16 addition [1] - 64:5	appeared [1] - 90:10	B B-Y-N-A-E [1] - 23:19 BA [2] - 7:1, 7:2

Bynae [10] - 23:17,

baby [1] - 10:8 background [1] -35:13 bank [3] - 14:11, 60:4 based [2] - 35:16, 63:8 became [7] - 62:6, 62:8, 68:9, 68:10, 69:1, 71:14, 75:17 beginning [2] - 17:16, 63:14 benefit [4] - 53:7, 53:9, 53:11, 65:14 benefits [3] - 13:12, 13:15, 80:6 best [1] - 64:22 better [1] - 25:25 between [3] - 21:23, 51:7, 69:4 big [2] - 42:2, 48:13 bigger [4] - 9:6, 9:8, 9:9, 9:19 bills [6] - 62:20, 62:21, 62:22, 62:23, 63:18, 72:8 binding [1] - 44:23 Birk [1] - 11:3 Birkdale [3] - 10:25, 11:2, 11:4 birthdate [1] - 23:1 BISHOP [1] - 91:9 Bishop [10] - 43:12, 43:22, 48:6, 51:8, 76:21, 76:22, 76:23, 77:1, 77:13, 77:23 bishop [32] - 29:14, 32:16, 34:18, 34:20, 34:22, 34:24, 37:15, 37:16, 39:14, 39:22, 39:25, 40:7, 40:9, 40:10, 40:17, 42:21, 42:25, 43:4, 45:20, 46:3, 61:4, 61:7, 65:25, 77:1, 81:17, 81:20, 81:21, 81:22, 81:24, 82:5, 82:6 bishopJLKJ@gmail. com [1] - 32:15 bishops [7] - 39:9, 46:1, 46:2, 46:5, 55:8, 77:16, 77:17 BISHOPS [1] - 91:9 Bishops [1] - 45:19 biweekly [1] - 12:18 Blake [17] - 39:14, 42:21, 42:25, 43:4, 43:12, 43:22, 46:2, 47:24, 48:7, 51:8, 76:21, 76:22, 76:23, 77:1, 77:13, 77:23 block [2] - 86:11, 86:12 board [19] - 12:15, 12:16, 40:18, 45:17,

45:19, 46:1, 46:2, 46:5, 52:22, 55:8, 56:7, 76:21, 76:22, 77:1, 77:2, 77:3, 77:16, 77:17, 78:3 BOARD [1] ~ 91:8 boards [1] - 39:3 bodies [1] - 40:23 body [4] - 40:20, 41:5, 47:15, 47:20 book [5] - 50:11, 50:20, 50:22, 82:20, 82:21 books [1] - 36:1 bookshelf [1] - 82:24 born [1] - 10:3 boss [1] - 33:12 bottom [1] - 19:22 bought [2] - 66:23, 68:25 Box [3] - 19:12, 19:14, 92:24 bracket [1] - 24:11 branches [4] - 41:1, 41:3, 42:9, 42:11 break [2] - 44:13, 78:15 breaking [1] - 60:23 briefly [1] - 75:2 bring [2] - 82:25, 83:2 bringing [1] - 71:4 broke [2] - 53:15, 86:21 broken [3] - 12:18, 55:17, 55:21 Brotherhood [2] -27:1, 27:3 brought [3] - 83:3, 83:22, 84:15 brown [1] - 6:2 budget [1] - 38:8 building [36] - 9:4, 9:7, 9:8, 9:9, 9:19, 9:21, 11:13, 26:5, 42:5, 58:12, 66:20, 66:21, 66:23, 67:3, 67:10, 67:18, 67:20, 67:22, 67:25, 68:3, 68:7, 68:8, 68:10, 68:17, 68:25, 69:3, 69:7, 69:11, 69:18, 69:20, 69:21, 69:23, 70:2, 76:5 buildings [1] - 69:25 bury [1] - 35:7 business [14] - 13:23, 14:1, 14:13, 14:19, 14:21, 15:7, 15:9,

15:10, 15:18, 16:8,

16:9, 16:10, 16:11,

buying [1] - 69:23

BY [1] - 23:20

59:22

23:22, 24:12, 30:20, 30:24, 30:25, 31:4, 31:7, 33:22, 33:23 Bynae's [1] - 53:18 C calendar [1] - 38:25 California [1] - 20:18 cameras [1] - 48:13 cannot [1] - 47:2 card [1] - 90:12 care [7] - 13:16, 13:18, 13:23, 25:7, 33:9, 33:14, 35:23 Care [1] - 13:21 cars [4] - 24:21, 24:23, 25:1, 25:16 cash [1] - 68:18 Cathy [5] - 20:12, 20:13, 91:14, 92:22, 92:24 CDs [1] - 25:18 certain [1] - 11:12 certainly [1] - 51:7 certificate [7] - 81:1, 81:4, 81:7, 81:18, 82:1, 82:12 CERTIFICATION [1] -91:11 Certified [2] - 91:14, 92:19 certify [2] - 91:15, 92:14 chairman [4] - 45:20, 45:23, 45:25, 46:1 challenged [1] - 49:4 change [1] - 60:11 CHANGE [1] - 89:4 changed [1] - 56:14 CHANGES [1] - 89:1 charge [7] - 16:24, 17:1, 35:2, 39:16, 40:22, 81:14, 82:8 charges [1] - 92:12 Charles [1] - 43:22 cheating [4] - 86:16. 86:17, 86:18 check [6] - 11:23, 34:8, 35:13, 64:3, 77:4, 78:18 checking [9] - 14:12, 14:24, 15:18, 15:19, 15:25, 17:7, 64:5, 64:18 checks [2] - 12:1, 17:20 CHILD [1] - 91:3 child [8] - 21:24, 22:1, 23:3, 23:13, 33:15, 33:17, 33:22, 33:24

children [3] - 21:20, 21:22, 24:16 choosing [2] - 24:14 CHRIST [3] - 91:6, 91:8, 92:9 Christ [15] - 10:2, 10:3, 10:6, 17:11, 29:14, 34:16, 40:8, 43:25, 44:1, 45:20, 52:4, 52:7, 53:24, 54:2, 79:10 church [112] - 8:14, 8:16, 8:19, 8:20, 8:24, 9:1, 9:2, 9:10, 9:11, 9:16, 9:23, 10:1, 10:3, 10:4, 10:5, 11:10, 11:11, 12:1, 12:2, 13:14, 15:7, 15:9, 17:11, 23:25, 24:1, 24:2, 25:21, 27:8, 27:14, 27:23, 29:14, 34:16, 36:4, 37:16, 37:17, 37:18, 38:2, 38:3, 38:11, 38:12, 39:1, 39:16, 39:18, 40:7, 40:19, 40:21, 40:24, 41:2, 41:6, 41:11, 43:25, 44:1, 45:8, 45:13, 45:16, 45:17, 45:19, 51:20, 51:24, 52:1, 52:4, 52:6, 52:11, 52:17, 52:24, 53:1, 53:8, 53:11, 53:17, 53:18, 53:19, 53:20, 53:21, 53:22, 53:23, 53:24, 53:25, 54:1, 54:5, 55:5, 58:1, 58:5, 58:14, 59:11, 59:12, 61:2, 61:7, 66:4, 66:10, 67:13, 68:11, 68:13, 68:16, 70:8, 71:18, 76:5, 76:16, 79:7, 79:9, 79:14, 79:19, 79:23, 80:9, 80:22, 82:19, 82:20, 82:21 Church [2] - 54:2, 79:10 CHURCH [3] - 91:6, 91:8, 92:9 church's [2] - 38:1, 62:7 churches [14] - 35:6, 37:12, 37:19, 42:12, 42:13, 42:17, 42:22, 66:2, 66:3, 70:13, 76:11, 76:24, 77:4, 77:7 Civil [1] - 50:10 civil [1] - 45:13 CIVIL [1] - 91:5 claimed [1] - 65:8

clear [5] - 17:17,

46:11, 68:24, 76:7, 78:14 clearer [1] - 47:12 clerical [1] - 14:8 clerk [2] - 14:4, 14:5 clicked [1] ~ 75:13 close [1] - 24:10 code [1] - 19:14 cogent [1] - 37:7 Coleman [3] ~ 22:10, 22:14, 23:22 collected [1] - 70:21 collection [2] - 12:9, 12:19 collections [1] - 12:11 college [5] - 6:15, 6:17, 6:18, 7:6, 31:24 coming [1] - 78:25 COMMISSION [1] -90:22 committee [6] - 27:8, 27:22, 45:23, 45:25, 55:16, 77:18 committees [1] - 39:3 communication [2] -78:1, 85:18 community [1] - 59:12 company [15] - 27:2, 67:19, 67:21, 67:25, 68:5, 68:11, 68:22, 69:4, 69:7, 69:13, 69:16, 69:21, 70:7, 70:18 compare [4] - 56:16, 56:17, 56:21, 57:16 compensating [1] -71:10 compensation [6] -57:25, 58:20, 66:1, 66:4, 79:21, 79:25 complaint [2] - 45:9, 45:16 concluded [1] - 86:23 conclusion [1] - 55:18 congregation [1] -43:24 consider[1] - 81:3 consideration [1] -90:16 considered [2] - 7:17, 81:6 consist [2] - 37:2, 37:3 consistent [1] - 12:21 consists [1] - 41:6 contact [4] - 24:12, 31:10, 74:9, 78:11 context [2] - 87:6, 87:16 continue [2] - 44:14, 60:20 control [2] - 37:12,

child's [4] - 22:3, 22:4,

23:1, 23:16

37:15 conventions [4] -35:7, 36:1, 38:21, 38:22 conversation [4] -30:12, 30:13, 78:6, 78:9 copies [4] - 18:5, 26:11, 56:16, 92:13 copy [13] - 18:11, 21:4, 46:6, 56:6, 56:9, 56:10, 56:20, 57:9, 57:10, 57:12, 57:14, 83:8 CORPORATION [1] -91:8 correct [76] - 15:22, 17:9, 19:9, 23:14, 23:19, 23:23, 26:14, 28:16, 29:22, 30:6, 30:11, 30:16, 31:7, 31:8, 42:10, 42:22, 42:23, 43:20, 45:10, 45:11, 48:8, 55:25, 58:2, 58:3, 58:6, 58:11, 58:17, 60:19, 60:22, 62:14, 62:17, 63:12, 63:17, 63:20, 64:24, 64:25, 65:10, 66:6, 66:8, 66:9, 66:16, 66:19, 67:7, 68:2, 68:6, 68:15, 68:23, 69:12, 69:14, 69:19, 70:4, 70:12, 71:3, 71:11, 72:5, 72:18, 75:18, 75:21, 76:3, 76:5, 76:7, 76:10, 76:18, 77:8, 78:12, 81:8, 81:25, 82:3, 83:1, 84:16, 85:9, 85:19, 87:5, 87:22, 90:3 corrections [5] -18:12, 18:19, 19:19, 19:24 correctly [3] - 29:9. 29:15, 84:13 counsel [2] - 92:5, 92:14 countries [1] - 42:16 COUNTY[1] - 90:8 couple [3] - 27:13, 33:4, 52:16 course [2] - 11:15, 65:12 court [1] - 57:21 COURT [1] - 91:1 cover[1] - 26:21 create [1] - 29:6 credential [5] - 37:6, 37:11, 38:12, 38:21, 41:6 credentials [1] - 37:7

credibility [2] - 49:3, 57:8 credible [3] - 48:19, 48:22, 48:23 credit [8] - 14:15, 14:19, 68:13, 69:6, 69:15, 69:24, 83:17, 84:3 Cruz [1] - 51:21 CSR [1] - 92:23 Cueva [1] - 63:6 current [1] - 62:4 Curry [4] - 45:3, 45:5, 45:7, 51:22

D D's[9] - 13:16, 13:18,

13:21, 14:9, 25:7,

25:10, 33:9, 33:14, 34:10 date [1] - 30:22 Date [1] - 92:23 DATE [1] - 89:3 dated [1] - 53:16 dates [2] - 30:21, 72:17 daughter [10] - 31:7, 73:24, 74:17, 74:22, 85:19, 85:21, 87:4, 87:9, 87:12, 87:25 days [1] - 19:18 deals [1] - 70:17 dealt[1] - 70:15 Debra [1] - 33:6 December [2] - 65:18, 65:19 decision [1] - 36:12 dedicate [1] - 71:24 **DEE** [1] - 13:20 deed [1] - 67:21 default [3] - 48:16, 48:18, 57:7 defend [1] - 49:22 DEFENDANT[1] -92-9 DEFENDANTS [1] -91:10 defending [1] - 49:24 deficit [3] - 71:5, 71:12, 71:14 defined [1] - 82:13 defunct [2] - 32:22, 32:24 degree [2] - 6:24, 35:18 Del [2] - 63:6, 63:9 deny [1] - 57:7 deposit [8] - 11:23, 11:25, 14:10, 16:20, 17:14, 63:24, 63:25, 64:3

deposited [2] - 17:10,

20:22 deposition [24] - 18:8, 19:7, 21:5, 22:19, 49:14, 49:18, 50:8, 50:9, 51:4, 51:9, 56:4, 56:22, 56:24, 57:16, 57:18, 84:4, 84:11, 90:2, 91:19, 91:21, 91:25, 92:4, 92:11, 92:13 Deposition [3] -57:23, 84:1, 84:8 DEPOSITION [2] -89:3, 91:12 deposits [1] - 16:18 description [1] - 90:12 despite [1] - 30:3 detected [1] - 29:5 dialogue [2] - 28:14, 31:15 dialogued [1] - 32:2 difference [1] - 29:4 different [2] - 30:13, 42:16 direct [3] - 11:23, 11:25, 14:10 direction [1] - 52:6 directly [8] - 11:24, 17:12, 20:22, 74:22, 76:19, 77:2, 77:11, 85:20 discrepancies [1] -57:18 DISTRICT [2] - 91:1, 91:1 **DIVISION** [1] - 91:2 doctrine [1] - 38:16 document [1] - 90:13 documents [2] - 83:2, 84:15 dollars [1] - 60:6 **DOMESTIC** [1] - 91:7 done [2] - 20:4, 78:24 down [10] - 12:18, 56:21, 67:1, 67:17, 67:19, 68:7, 68:10, 68:16, 68:18, 68:20 drama [1] - 29:7 drive [1] - 53:6 duly[1] - 91:17 during [4] - 55:6, 58:6, 62:4, 65:11 duties [7] - 14:7, 14:8, 35:5, 61:1, 61:6, 82:13, 82:18

E

early [1] - 23:5 earn [1] - 25:6 earned [1] - 65:11 Edward [1] - 43:22 eight [1] - 13:1 either [4] - 12:18,

22:11, 35:25, 50:23 elaborate [2] - 43:9, 82:16 elders [2] - 36:3, 37:5 elevated [1] - 36:6 eliminated [1] - 26:6 email [19] - 21:3, 21:12, 22:13, 22:17, 31:21, 32:3, 32:10, 32:24, 72:19, 73:2, 73:4, 73:9, 73:11, 73:15, 73:16, 73:17, 74:5, 74:6 emails [3] - 73:11, 73:23, 78:1 employed [1] - 92:15 employee [1] - 77:11 end [5] - 13:6, 18:21, 36:18, 57:3, 65:18 ENDA[1] - 14:19 endorsement [1] - 6:2 engaged [1] - 48:6 engagement [1] -16:22 engagements [1] -16:25 engaging [1] - 47:23 entered [1] - 55:14 enticing [1] - 88:5 entire [1] - 39:20 entitled [1] - 50:4 especially [1] - 51:11 essence [1] - 68:7 establishing [1] -60:24 evangelists [1] - 37:5 events [1] - 26:13 evidence [2] - 83:9, 83:16 examination [1] -91:23 except [1] - 90:3 excuse [5] - 48:17, 48:19, 48:24, 48:25, 49:2 executed [1] - 90:15 executive [1] - 40:25 Exhibit [9] - 56:1, 56:4, 57:4, 57:22, 57:23, 84:1, 84:4, 84:8, 84:11 exhibits [1] - 92:13 expense [6] - 14:13, 14:20, 15:10, 16:9, 16:10, 16:11 expenses [3] - 16:13, 17:3, 26:6 experience (3) -35:17, 35:21, 36:2

Expiration [1] - 92:23

EXPIRES [1] - 90:22

expires [1] - 6:1

explain [2] - 18:9,

82:16 expressed [1] - 90:16 eye [1] - 48:13 eyes [1] - 6:2

F

face [1] - 47:13 fact [2] - 19:6, 60:16 fair [4] - 40:12, 57:1, 57:19, 86:18 fairly [1] - 87:18 familiar [1] - 75:1 far [2] - 25:23, 25:24 fargo [2] - 14:20, 14:21 Fargo [4] - 15:6, 15:12, 16:1, 83:18 fashion [2] - 56:14, 84:21 Federal [1] - 50:9 feet [1] - 9:22 female [1] - 37:5 fight [1] - 29:5 fighting [2] - 29:4 file [1] - 18:2 filed [4] - 29:13, 45:9, 45:16, 48:16 filing [1] - 14:8 fill [2] - 9:23, 9:24 finance [18] - 27:8, 27:22, 37:8, 67:19, 67:21, 67:25, 68:11, 68:12, 68:22, 69:4, 69:7, 69:13, 69:16, 69:21, 70:7, 70:13, 70:18, 77:18 Finance [3] - 12:15, 12:16, 70:8 financed [1] - 67:25 finances [5] - 37:16, 37:17, 44:10, 65:5, 71:15 financial [4] - 7:9, 36:23, 37:2, 37:3 financially [1] - 92:17 financier [1] - 38:10 financing [1] - 69:19 findings [1] - 46:6 fine [3] - 56:19, 76:6 finish [2] - 78:16, 78:17 finished [4] - 78:13, 78:23, 84:23, 84:24 first [3] - 44:5, 58:12, 79:22 fit [1] - 46:3 five [4] - 38:24, 44:13, 78:15, 78:23 five-minute [2] -44:13, 78:15 fix [1] ~ 86:5 flock [1] - 36:8

flow [1] - 86:12 focus [2] - 60:15, 71:15 follow[1] - 88:3 following [2] - 91:16, 92:5 follows [2] - 86:9, 91:25 FOR [4] - 90:21, 91:1, 92:6, 92:9 foregoing [2] - 90:2, 90:14 forgot [1] - 80:18 form [10] - 37:22, 38:5, 38:23, 39:17, 39:21, 40:13, 49:5, 56:14, 80:14, 84:21 formal [1] - 80:5 four [1] - 8:4 frame [1] - 81:9 free [4] - 71:16, 71:17, 71:25, 72:6 freelance [3] - 7:25, 8:3, 8:5 freelanced [1] - 7:25 friends [1] - 54:14 function [6] - 53:22, 53:23, 53:25, 54:1, 54:2, 77:10

G

general [15] - 40:17, 40:20, 41:4, 41:5, 41:8, 41:12, 76:21, 76:25, 77:2, 77:3, 78:2, 82:10 generation [1] - 10:5 girl[1] - 87:25 Given [1] - 90:17 given [5] - 21:1, 68:22, 84:19, 91:19, 92:3 glide [13] - 74:15, 74:18, 74:21, 74:23, 74:25, 75:4, 75:6, 75:8, 75:9, 75:11, 75:17, 87:6 god [1] - 52:7 God [15] - 10:1, 10:3, 10:6, 17:11, 29:14, 34:16, 40:7, 43:25, 44:1, 45:20, 52:4, 53:24, 54:2, 79:10, 86:14 GOD [3] - 91:6, 91:8, 92:9 government [1] -40:24 graduate [3] - 6:13, 6:22, 7:5 graduation [1] - 7:8 grandma [1] - 30:3 gray [2] - 28:16, 29:1

guaranteed [1] - 65:22

guess [8] - 10:8, 14:13, 16:16, 42:6, 62:23, 64:13, 81:4, 87:17 guilty [1] - 55:12 guy [2] - 39:20, 40:12

Н

hand [2] - 56:2, 90:17

handed [1] - 28:5

handle [1] - 12:13

handled [2] - 27:6,

half[1] - 65:7

27:7 hands [1] - 82:9 harassed [1] - 50:25 harassing [1] - 49:8 hard [2] - 17:5, 29:15 hardly [1] - 15:14 head [3] - 39:20, 40:12, 40:18 headquarters [14] -41:21, 41:22, 42:4, 42:5, 75:24, 75:25, 76:1, 76:2, 76:4, 76:6, 76:9, 77:7, 77:9, 77:20 health [3] - 13:12, 13:15, 13:23 heard [2] - 48:2, 48:3 heart [1] - 86:21 held [1] - 60:10 help[1] - 58:20 helped [1] - 59:4 helping [1] - 58:22 hereby [2] - 90:2, 91:15 hide [1] - 51:12 High [1] - 63:7 high [3] - 6:13, 63:10, 63:11 Hit [1] - 86:1 Hobbs [1] - 6:11 hold [1] - 85:15 holders [3] - 37:11, 38:12, 41:6 home [20] - 13:23, 19:11, 20:24, 26:23, 36:16, 36:22, 37:20, 38:4, 38:15, 38:18, 39:5, 39:19, 60:3, 61:13, 62:23, 75:22, 75:24, 76:1, 76:8, 82:25 honorarium [1] - 17:5 hope [1] - 23:19 Hotmail [1] - 73:1 hour [2] - 34:13, 44:12 HOUR(S):00 [1] - 92:2 HOUR(S):49 [1] - 92:1 hours [1] - 34:14 house [4] - 11:5, 52:3,

52:8, 63:18 housing [2] - 11:14, 11:18 hundred [1] - 60:6 hurt [2] - 86:21

I-S-S-I-A [1] - 22:8 idea [2] - 22:2, 44:21 identity [1] - 90:12 IN [5] - 90:21, 91:1, 91:6, 91:8, 92:9 Inaudible [1] - 86:17 INC [1] - 91:7 incidents [1] - 26:19 included [1] - 17:5 includes [1] - 92:5 income [11] - 25:8, 25:9, 59:13, 59:14, 59:15, 59:16, 59:17, 59:18, 59:21, 59:24, 62:19 inconclusive [1] -28:13 incorporated [2] -45:20, 79:8 incorrect [3] - 48:10, 48:11, 48:15 indicating [2] - 28:22, 73:18 individual [3] - 37:4, 52:25, 61:3 informal [1] - 80:6 Information [3] - 19:4, 21:8, 22:24 information [10] -20:24, 21:5, 21:12, 22:23, 27:21, 64:12, 64:16, 77:14, 87:11, 92:3 insert [1] - 22:22 instead [1] - 62:7 instructed [1] - 19:21 instrument [1] - 90:14 insurance [9] - 25:20. 25:22, 25:24, 25:25, 26:7, 26:9, 26:21. 26:25, 27:2 interested [1] - 92:18 internet[1] - 47:23 interview [1] - 36:10 investigated [1] - 88:4 invoked [2] - 55:12, 55:15 involved [1] - 29:7 irrelevant [4] - 49:20, 51:3, 51:6, 51:8

J

J.S [1] - 91:3

J@AOL.com [1] -

32:13 JAMES [7] - 89:2, 90:1, 90:5, 90:10, 91:9, 91:12, 91:17 JERRY [1] ~ 92:7 JETER [22] - 28:20, 37:22, 38:5, 38:23, 39:17, 39:21, 40:13, 49:5, 49:8, 49:12, 49:17, 49:24, 50:2, 50:7, 50:13, 50:17, 50:20, 73:17, 80:14, 80:17, 85:14, 92:9 Jeter [1] - 88:10 JETER.... [1] - 92:2 **JLKJ** [2] - 32:17, 32:18 JLKJ@gmail.com [1] - 32:19 JLKJones [2] - 32:4, 32:5 job [7] - 13:17, 14:7, 61:20, 65:22, 82:13, 82:17, 82:18 John [2] - 45:20, 46:3 join [1] - 10:1 joint [1] - 14:24 JONES [7] - 89:2, 90:1, 90:5, 90:10, 91:9, 91:12, 91:17 Jones [3] - 10:17, 29:14, 50:24 judge [2] - 48:18, 57:8 judgment[9] - 44:17, 44:20, 44:23, 48:17, 48:18, 51:4, 51:9, 57:7, 65:1 judiciai [1] - 41:1 July [1] - 30:23 jumping [1] - 57:25 junior[1] - 6:18 jurisdiction [1] - 35:1 jurisdictional [3] -34:18, 34:20, 34:23 Jurisdictional [1] -34:21

K

JUSTIN [2] - 92:2,

juveniles [1] - 88:5

92:9

Kim [1] - 75:7 Kimberly [14] - 29:13, 54:10, 72:10, 73:20, 74:12, 74:16, 74:19, 74:21, 85:20, 87:2, 87:17, 87:19, 87:23, 88:2 KIMBERLY [1] - 91:3

Kimberly's [5] - 73:23, 74:13, 85:19, 87:11, 87:25 kind [3] - 24:23, 35:21, 53:3 Kmoney [1] - 73:2 Kmoney-P@hotmail. com [1] - 73:2 knowledge [1] - 39:1 knowledgeable [1] -38:9 known [1] - 90:10 KR [2] - 22:6, 22:7 Krissia [5] - 22:6, 22:9, 22:13, 23:24, 53:18

L lack [1] - 25:24 lady [2] - 52:3, 52:8 LaKeith [8] - 29:14, 89:2, 90:1, 90:5, 90:10, 91:9, 91:12, 91:17 land [1] - 25:18 landlord [3] - 11:24, 17:13, 20:11 last [17] - 10:16, 18:2, 18:22, 22:9, 33:4, 41:17, 54:23, 58:13, 58:15, 62:1, 77:22, 77:25, 78:6, 78:9, 80:20, 85:3, 85:6 lasted [1] - 72:16 lately [1] - 17:12 lawsuit [1] - 29:13 lawyer [2] ~ 45:6, 45:7 lay [1] - 36:3 laying [1] - 82:9 leader [2] - 39:15, 40:10 lease [7] - 52:16, 52:17, 53:1, 53:3, 53:12, 83:19, 83:24 leases [1] - 52:17 led [1] - 68:19 left [2] - 9:13, 9:14 legal [3] - 20:2, 20:7, 38:6 legally [1] - 44:23 legislative [2] - 40:20, 40.25 legislature [1] - 41:7 less [1] - 34:3 LEVI [8] - 49:10, 49:15, 50:15, 50:19, 50:22, 86:1, 86:4, 92:7 liability [1] - 26:6 lie [1] - 48:13 life [1] - 71:24 likewise [1] - 29:3

itself [6] ~ 9:1, 16:11,

61:2

ITT [1] - 7:9

35:16, 36:18, 38:13,

limited [1] - 76:16 Lincoln [5] - 24:24, 24:25, 25:4, 53:4, 53:13 line [1] - 44:14 LINE [1] - 89:4 link [2] - 75:10, 75:13 listen [2] - 86:20, 87:17 live [2] - 19:9, 22:1 lives [1] - 22:11 loan [3] - 7:16, 7:17, 7:18 loans [1] - 7:14 local [12] - 37:15, 37:19, 38:1, 38:3, 39:18, 42:13, 66:2, 66:3, 76:24, 77:4, 77:6 located [1] - 8:20 Lomas [17] - 9:3, 9:5, 9:6, 9:17, 9:19, 9:22, 9:23, 58:1, 66:5, 66:7, 66:10, 67:22, 68:1, 68:8, 68:25, 70:24, 71:9 long-term [4] - 62:14, 63:3, 63:4, 63:5 look [10] - 19:18, 22:18, 27:9, 28:6, 28:17, 29:8, 47:16, 56:3, 56:11, 57:15 looked [2] - 45:1, 45:2 Lou [1] - 48:18 loves [1] - 86:14 Lubbock [1] - 92:25 LYN [1] - 61:11

M

M-A-C-K-L-I-N [1] -61:12 ma'am [4] - 61:25, 80:19, 86:13 Macklin [3] - 61:7, 61:9, 61:11 mail [3] - 19:8, 19:17, 19:21 mailing [1] - 19:12 main [1] - 60:15 maintaining [1] - 48:5 MALE [1] - 86:10 malpractice [1] -25:25 man [1] - 86:5 manager [2] - 7:11, 7:18 manual [1] - 82:20 mark [9] - 56:1, 57:18, 83:9, 83:16, 83:21, 83:24, 84:2, 84:6, 84:10 marked [1] - 84:13

marriage [1] - 65:12

mathematics [1] -69:2 matters [1] - 45:8 MATTHEWS [1] - 92:7 MCLAURIN [1] - 92:8 me.com [2] - 32:6, 32:8 mean [56] - 8:25, 9:4, 15:18, 24:21, 26:15, 26:16, 26:17, 26:18, 27:12, 27:16, 27:22, 32:1, 34:3, 34:23, 35:14, 36:17, 37:14, 38:24, 42:11, 44:9, 44:21, 45:1, 45:12, 49:2, 51:6, 54:6, 55:13, 56:10, 56:18, 58:6, 58:23, 59:1, 59:5, 59:9, 60:5, 60:6, 71:7, 71:14, 73:2, 73:6, 73:12, 73:13, 74:12, 75:13, 76:1, 76:3, 77:20, 80:7, 81:12, 81:16, 84:21, 87:5, 87:17, 87:19 means [1] - 18:10 meet [3] - 22:16, 23:24, 77:4 meeting [6] - 39:12, 41:18, 77:24, 78:2, 78:8, 78:9 member [6] - 24:1, 52:6, 52:13, 54:5, 55:5, 77:17 members [1] - 9:11 Memphis [3] - 41:19, 41:20, 41:23 men [2] - 40:18, 47:23 message [5] - 74:15, 74:17, 87:8, 87:16 messages [10] - 28:6, 28:12, 28:14, 28:16, 28:21, 30:8, 30:15, 30:18, 31:12, 75:19 met [8] - 31:2, 44:3, 44:5, 53:16, 53:17, 53:18, 53:19, 53:20 metropolitan [1] -79:9 Mexico [17] - 6:18, 6:19, 8:8, 8:21, 19:15, 24:3, 34:25, 35:3, 37:10, 61:4, 61:16, 65:25, 76:12, 76:13, 76:17, 81:15, 82:8

married [9] - 10:10,

10:12, 10:18, 21:15,

21:18, 23:8, 23:9,

23:11, 65:9

Mary [1] - 48:18

master's [1] - 7:1

midwest [1] - 27:5 might [1] - 60:4 million [2] - 29:13, 66:25 mind [1] - 83:10 mine [2] - 56:11, 62:8 minimum [4] - 14:10, 34:10, 34:12, 59:25 minister [1] - 36:5 ministers [1] - 37:5 ministry [3] - 8:1. 8:17, 35:16 MINOR [1] - 91:3 minors [1] - 88:5 minute [2] - 44:13, 78:15 MINUTE(S [2] - 92:1, 92:2 minutes [1] - 78:23 misquote [1] - 18:17 mistakes [1] - 26:2 MKS [1] - 24:25 MO [1] - 29:6 Monday [2] - 12:8, 12:10 Mondays [2] - 12:4, 12:5 money [29] - 12:13, 12:14, 12:16, 15:11, 16:18, 16:20, 16:23, 25:6, 25:12, 33:13, 37:9, 37:19, 38:15, 38:19, 51:12, 58:4, 58:23, 58:25, 59:23, 60:1, 60:9, 60:10, 65:11, 65:14, 67:17, 67:19, 68:9, 71:20, 77:7 monies [2] - 38:1, 38:16 month [21] - 11:8, 11:19, 11:20, 12:2, 12:24, 13:6, 25:4, 34:6, 34:7, 58:1, 58:19, 60:6, 60:7, 62:18, 66:8, 66:11, 66:15, 70:20, 71:4, 80:3 months [2] - 27:13 Morgan [2] - 27:25, 28:1 mortgage [8] - 60:15, 66:16, 66:18, 67:16, 68:5, 70:21, 71:6, 71:14 most [5] - 17:4, 30:25, 32:1, 36:2, 54:25 mother [2] - 30:4, 53:18 mother's [2] - 22:3, 22:4

motorcycle [1] - 6:3 move [1] - 11:13 moved [5] - 26:5, 58:11, 67:20, 70:24, 71:9 MR [44] - 28:20, 28:22, 37:22, 38:5, 38:23, 39:17, 39:21, 40:1, 40:13, 49:5, 49:8, 49:10, 49:12, 49:15, 49:17, 49:24, 50:2, 50:13, 50:15, 50:17, 50:22, 72:20, 72:24, 73:17, 73:18, 79:4, 80:14, 80:17, 85:12, 85:14, 85:15, 85:25, 86:1, 86:3, 86:4, 86:5, 88:8, 88:10, 92:1, 92:2, 92:6, 92:7, 92:7, 92:8 must [1] - 35:10 mutual [2] - 27:1, 27:3

Ν

N-A-E [1] - 23:21

NAME [1] - 89:2

14:17

N-U-S-E-N-D-A[1] -

name [9] - 10:16, 22:3,

22:4, 22:9, 23:16,

27:2, 52:9, 81:12, 90:13 names [1] - 59:6 national [2] - 38:11, 39:1 Navigator [2] - 53:4, 53:13 need [11] - 6:4, 18:15, 20:8, 35:18, 35:22, 43:7, 56:11, 78:18, 83:13, 84:24, 87:17 negative [1] - 15:13 never[31] - 7:18, 12:1, 21:1, 27:6, 28:21, 29:5, 30:1, 31:2, 31:19, 37:14, 43:3, 43:5, 43:13, 43:15, 43:18, 43:19, 43:20, 43:21, 48:5, 51:19, 55:14, 65:8, 66:1, 74:5, 74:6, 74:7, 74:8, 74:21, 80:5, 81:5, 85:18 new [4] - 26:5, 67:17, 67:22, 67:25 New [17] - 6:18, 8:8, 8:21, 19:15, 24:2, 34:25, 35:2, 37:9, 61:4, 61:16, 65:25, 76:12, 76:13, 76:17, 81:15, 82:8 newer [2] - 9:7, 9:9 next [2] - 13:3, 29:25

NO[1] - 91:6 none [1] - 69:9 NONPROFIT [1] - 91:7 normally [7] - 15:11, 17:14, 33:16, 47:16, 59:2, 62:22, 82:17 Norte [2] - 63:6, 63:9 Northeast [1] - 11:4 NORTHERN [1] - 91:1 northwest [1] - 8:23 notarized [2] - 19:23, 19:25 NOTARY [1] - 90:21 notation [1] - 56:24 note [1] - 28:5 noted [1] - 90:3 notes [3] - 78:14, 78:18, 79:2 nothing [1] - 71:11 November [7] - 29:12, 37:1, 58:10, 60:12, 60:17, 65:18, 65:19 number [16] - 6:7, 18:17, 20:25, 21:3, 22:13, 28:3, 54:21, 74:23, 75:5, 75:6, 75:9, 75:14, 75:15, 75:16, 75:17 Number [3] - 56:2, 57:5, 57:22 numbers [2] - 15:15, 31:20 NUS [1] - 14:18 Nusenda [4] - 14:15, 14:16, 14:17, 64:9

O oath [2] - 48:4, 90:11 object [3] - 40:2, 80:16 objecting [1] - 40:3 objection [14] - 37:22, 38:5, 38:23, 39:17, 39:21, 40:2, 40:13, 49:5, 49:7, 49:18, 50:3, 50:8, 80:14, 80:16 objections [1] - 40:4 October [3] - 8:1, 8:6, 8:19 OF [10] - 89:3, 90:7, 90:8, 90:22, 91:1, 91:6, 91:8, 91:8, 91:12, 92:9 offer [1] - 83:21 offerings [2] - 16:15, 38:20 office [15] - 27:10, 36:16, 36:22, 37:20, 38:4, 38:15, 38:18, 39:5, 39:19, 61:14, 75:22, 75:25, 76:1, 76:8, 90:17

motion [3] - 48:16,

57:6, 57:7

officer [4] - 7:16, 7:19, 91:18, 92:4 officer's [1] - 92:11 official [1] - 18:11 often [2] - 36:24, 39:5 old [8] - 23:3, 24:6, 24:7, 33:1, 33:23, 44:5, 67:3, 68:3 once [9] - 10:11, 19:22, 22:18, 36:25, 39:6, 56:22, 57:14, 67:20, 80:15 one [57] - 6:2, 7:13, 9:22, 14:12, 15:8, 16:12, 19:13, 21:15, 21:23, 21:24, 29:8, 29:11, 29:12, 29:15, 29:21, 29:25, 30:6, 30:9, 30:10, 30:20, 30:22, 31;20, 32:9, 33:22, 34:7, 36:12, 40:15, 40:19, 48:24, 49:4, 52:25, 53:2, 53:13, 54:24, 55:1, 56:12, 58:8, 63:1, 63:6, 66:7, 72:10, 72:16, 72:22, 72:25, 75:7, 81:16, 81:18, 82:15, 83:17, 84:3, 84:10, 85:2, 85:15, 86:10 ones [5] - 29:20. 32:21, 33:2, 35:25, ongoing [3] - 28:14, 31:15, 34:4 operate [3] - 38:4, 38:10, 39:2 operates [1] - 38:12 opinion [1] - 47:10 opportunity [1] -56:22 oral [1] - 91:18 order [1] - 87:18 organization [5] -39:20, 40:11, 40:14, 52:5, 59:22 original [1] - 92:12 originals [3] - 83:7, 83:8, 83:13 otherwise [1] - 92:18 outcome [1] - 92:18 outright [2] - 67:10, 69:11 oversee [1] - 37:17 own [10] - 11:5, 14:1, 24:20, 64:4, 67:10, 69:25, 79:12, 79:14, 79:18, 85:8 owned [2] - 68:25, 69:10 owner [2] - 67:20, 68:10

owners [1] - 68:9

P-A-R-M-A-R [1] -20:14 P-A-S-T-O-R-J-L-J@ **AOL.com** [1] - 32:13 p.m [1] - 79:6 P.O [3] ~ 19:12, 19:14, 92:24 P@hotmail.com[1] -

73:2 package [2] - 79:22, 79:25

PAGE[1] - 89:4 page [4] - 29:3, 83:17, 84:3, 84:10 pages [2] - 83:25, 84:7 paid [10] - 11:11,

11:14, 11:18, 11:20, 11:24, 59:18, 59:21, 62:4, 62:22, 66:8 paper[1] - 48:20 papers [2] - 14:8,

26:23 parents [1] - 10:4 Parmar [4] - 20:12, 20:14, 52:10, 52:11 part [7] - 39:2, 49:13,

52:1, 52:4, 52:5, 52:11, 79:14 particular [4] - 8:24, 37:4, 52:25 parties [2] - 92:5,

92:15

party [1] - 91:24 pass [2] - 85:12, 88:8 pastor [11] - 35:10, 36:5, 36:6, 51:20, 81:12, 81:17, 81:19,

81:20, 81:21, 81:22 pastoral [1] - 35:23 pastoring [4] - 8:6, 8:7, 8:17, 60:24

pastorJL [1] - 72:19 pastorJL@AOL.com [1] - 72:21 pastorJLJ@AOL.

com [1] - 32:11 pastors [5] - 35:6, 35:7, 35:8, 36:3,

37:5 patterns [1] - 60:23 pay [41] - 11:7, 11:22, 12:3, 12:11, 12:17,

12:21, 14:9, 16:12, 16:14, 17:2, 17:10, 17:11, 17:12, 17:15, 17:18, 20:21, 25:6, 33:17, 34:4, 34:5, 34:6, 37:7, 44:20, 44:22, 51:22, 51:24,

51:25, 55:24, 58:8,

58:10, 58:13, 58:16, 60:5, 62:7, 62:20, 62:21, 63:18, 66:20, 66:21, 71:6, 72:8 paying [11] - 12:2, 13:10, 25:1, 33:24. 58:18, 60:13, 60:17, 70:20, 71:5, 71:13,

71:18 payment [1] - 67:1 payments [2] - 25:3, 33:16

pays [1] - 62:24 people [9] - 9:10, 9:16, 36:10, 41:25, 42:7, 59:5, 59:11, 77:4, 82:17

per [1] - 34:6 percent [2] - 36:2, 69:19

perfectly [1] - 50:3

period [1] - 55:6 permanent [1] - 62:16 person [4] - 27:24, 30:17, 49:3, 90:13

personal [9] - 13:16, 13:18, 15:4, 16:11, 17:8, 25:7, 33:9, 33:13, 42:25

Personal [1] - 13:21 personally [1] - 90:10 pertains [1] - 52:24 phone [12] - 20:25,

21:3, 22:13, 27:16, 28:3, 31:20, 73:8, 74:13, 75:15, 75:17, 78:1, 87:11

picture [8] - 46:9, 46:10, 46:14, 46:19, 46:21, 46:23, 47:9, 85:22

pictures [5] - 46:15, 46:18, 47:1, 47:11, 47:17

place [5] - 9:6, 17:2, 41:17, 51:11, 58:12

places [1] - 7:13 plain [2] - 43:7, 76:25 Plaintiff [1] - 92:12

Plaintiff's [3] - 56:1, 57:4, 57:22

PLAINTIFFS [2] -91:4, 92:6

plan [1] - 9:23 play [3] - 85:24, 85:25, 86:7

played [1] - 86:9 plea[1] - 55:14 plead [4] - 55:9, 55:12, 55:13, 55:14

plus [2] - 42:18, 42:19

pocket [1] - 60:11 pockets [1] - 60:3

point [3] - 11:12, 56:23, 84:5 points [1] - 55:19 policies [2] - 40:16, 40:19 policy [1] - 40:18

Pollard [5] - 29:13, 45:9, 54:10, 72:10, 73:20

POLLARD [1] - 91:3 position [2] - 10:1, 34:17

possess [1] - 37:6 possible [1] - 64:10 possibly [3] - 13:5, 24:11, 27:25 post [2] - 51:4, 51:9

posted [1] - 47:23 preaching [2] - 8:13, 8:18

prepared [1] - 44:21 preparing [1] - 92:12 present [2] - 8:10,

8:11 presently [1] - 36:4 preside [1] - 35:6 presiding [9] - 39:22, 39:25, 40:6, 40:7, 40:9, 40:10, 40:17,

42:21, 77:1 press [1] - 86:1 presume [1] - 26:17 pretty [1] - 71:17 price [2] - 66:22, 66:24

prime [1] - 71:15 private [1] - 43:3 privy [1] - 21:2

problem [2] - 20:5, 30:9

Procedure [1] - 50:10 proceeding [1] - 92:16 process [2] - 20:3, 20:7

produce [1] - 48:9 Properties [1] - 84:6 property [4] - 26:6, 85:3, 85:5, 85:9 protect [1] - 50:3

proved [1] - 90:11 provide [4] - 21:5, 21:13, 22:22, 25:21

provided [7] - 20:23, 56:6, 83:16, 83:18, 83:19, 83:20

psychology [2] - 6:25, 7:3

public [1] - 17:24 PUBLIC [1] - 90:21 purchase [1] - 11:13 purported [1] - 47:24 purposes [1] - 90:15 pursuant[1] - 92:3

put [13] - 19:7, 67:17, 67:19, 68:7, 68:10, 68:16, 68:18, 68:19, 75:15, 75:16, 81:9, 83:9, 83:16

Q

gualified [3] - 35:12, 35:14, 35:15 questioning [1] -44:14 questionnaire [1] -31:25 questions [2] - 51:16, 88:10

R

R-O-S-A-L-I-N-D [1] -10:15 raise [1] - 37:12 raised [1] - 37:9 raises [1] - 38:19 random [1] - 59:5 rare [1] - 16:15 ratified [1] = 82:10 read [14] - 18:6, 18:9, 18:12, 29:1, 29:9, 29:11, 29:15, 29:23, 30:6, 55:10, 62:1, 73:14, 80:20, 90:1 reading [1] - 22:21 ready[1] - 11:13 real [1] - 85:8 really [4] - 38:9, 59:5, 62:2, 75:3 **REASON** [1] - 89:4 receive [5] - 17:20, 25:12, 33:13, 59:23, 75:19 received [6] - 12:1, 58:7, 66:1, 66:4, 80:3, 80:5 receiving [2] - 70:23, 71:8 recess [2] - 44:15, 79:6 recognize [2] - 28:8, 73:8 record [9] - 38:6, 38:7, 43:21, 49:13, 50:3, 76:4, 79:5, 91:19, 92:5 Recording [2] - 86:9, 86:23 records [2] - 27:10, 27:15 referring [1] - 76:8 regards [2] - 45:13, 45:16 registered [1] - 41:8

regular [2] - 13:16,

65:25

67:3, 68:3, 68:8,

related [2] - 77:12, 92:15 relationship [21] -28:15, 29:6, 31:14, 33:10, 39:14, 42:25, 43:11, 43:16, 43:21, 51:7, 51:10, 51:11, 51:17, 54:7, 54:10, 54:12, 54:19, 72:9, 72:13, 72:16, 73:20 relationships [4] -43:23, 43:24, 54:4, 54:6 remember [2] - 70:7, 74:3 renewal [1] - 83:21 rent [15] - 11:6, 11:7, 17:13, 17:15, 17:18, 20:21, 52:3, 52:8, 58:18, 60:5, 62:3, 62:23, 62:24, 63:19 rental [3] - 83:19, 83:20, 83:24 repeat [2] - 19:13, 34:19 repeated [1] - 71:7 repeating [1] - 71:8 rephrase [1] - 54:16 report [5] - 37:8, 38:11, 56:6, 59:13, 59:15 reporter [3] - 57:21, 62:1, 80:20 Reporter [1] - 91:14 REPORTER'S [1] -91:11 reports [10] - 36:16, 36:17, 36:21, 36:22, 36:23, 37:2, 37:3, 37:6, 37:7, 38:21 represent [10] - 40:3, 45:4, 46:9, 49:10, 49:15, 49:18, 49:21, 49:23, 50:6, 50:8 representing [1] -45:7 Requested [3] - 19:4, 21:8, 22:24 required [5] - 34:4, 38:11, 65:6, 65:7. 88:11 Reserve [1] - 85:14 reserve [1] - 88:10 reside [1] - 10:20 respect [1] - 30:3 respected [1] - 30:3 responding [1] -31:17 response [1] - 85:1 responses [1] - 31:1 responsibility [2] -62:7, 62:9 return [1] - 91:23

returns [1] - 18:3 ride [1] - 6:3 rights [1] - 69:1 Rita [3] - 27:25, 28:1, 28:3 Robinson [1] - 48:18 RONALD [24] - 28:22, 40:1, 49:6, 49:21, 49:25, 50:5, 50:11, 50:14, 61:24, 72:20, 72:24, 73:18, 79:4, 80:15, 80:18, 85:12, 85:15, 85:25, 86:3, 86:5, 88:8, 92:1, 92:6, 92:8 ronald [1] - 50:24 Ronald [23] - 28:23, 37:24, 38:14, 39:4, 39:19, 39:23, 40:5, 40:15, 44:16, 56:5, 57:24, 62:3, 73:1, 73:19, 79:7, 80:21, 84:2, 84:5, 84:9, 84:12, 85:17, 86:7, 86:24 room [1] - 43:3 Rosalind [8] - 10:13, 10:16, 10:18, 15:1, 15:2, 21:18, 23:11, 62:10 Rosalind's [3] - 25:8, 58:20, 62:8 routine [1] - 60:24 royal [2] - 10:25, 11:1 rule [7] - 50:7, 50:9, 50:15, 50:19, 55:12,

S

55:15, 69:25

55:17, 55:21

Rules [1] - 50:10

rumor [4] - 42:24,

rumors [1] - 43:8

running [1] - 58:1

sake [1] - 83:12

43:6, 43:11

rules [4] - 50:4, 50:18,

sanctions [1] - 55:22 satisfied [1] - 84:18 saved [5] - 58:23, 58:25, 60:1, 60:2, 60:9 savings [7] - 14:12, 14:24, 15:19, 15:24, 17:7, 64:5, 64:19 school [4] - 6:11, 6:13, 63:1, 63:14 schools [2] - 17:24, 17:25 scrolling [1] - 30:23 seal [1] - 90:17 **Seattle** [1] - 45:6 Second [6] - 11:17,

69:7, 69:11 second [7] - 8:23, 9:11, 9:20, 9:21, 11:10, 29:11, 56:3 Security [1] - 6:7 see [17] - 27:10, 28:20, 29:1, 29:16, 30:22, 37:13, 50:14, 56:11, 56:13, 57:17, 61:22, 64:2, 73:14, 73:17, 76:23, 83:3, 83:5 sell [1] - 67:3 selling [2] - 66:22, 66:24 seminary [1] - 35:25 send [21] - 18:11, 19:5, 29:19, 30:9, 31:20, 36:16, 36:22, 36:23, 37:19, 73:4, 73:11, 73:23, 74:14, 74:15, 74:17, 74:23, 77:7, 87:8, 87:14, 87:15 sending [5] - 30:19, 31:1, 31:3, 31:4, 73:16 sense [1] - 48:21 sensor[1] - 86:20 sent [23] - 29:17, 29:18, 29:19, 29:21, 30:24, 30:25, 31:5, 31:12, 31:18, 38:15, 38:16, 74:5, 74:6, 74:7, 74:8, 74:21, 75:10, 85:18, 87:7, 87:10, 87:13, 87:14 separate [4] - 40:23, 41:1, 41:2, 64:4 September [2] - 78:2, 92:19 service [5] - 23:25, 24:2, 74:11, 74:14, 75:20 set [7] ~ 12:20, 38:17, 40:19, 57:7, 59:19, 59:21 sets [1] - 40:16 seven [1] - 34:13 several [1] - 32:10 sex [1] - 47:23 sexual [14] - 43:11, 43:16, 43:21, 43:24, 48:6, 51:6, 51:11, 54:7, 54:9, 54:12, 54:19, 72:13, 72:16, 73:20 sexually [1] - 88:5 shares [1] - 79:16 sheard [2] - 45:21, 46:3 sheet [1] - 18:21

shield [1] - 16:16 shifting [1] - 63:7 Shorthand [1] - 91:14 show [4] - 30:21, 30:24, 50:20, 73:7 showing [1] - 73:8 sign [5] - 18:6, 18:9, 19:22, 32:22, 75:10 signature [3] - 88:11, 90:2, 91:23 SIGNATURE [1] - 89:1 signed [5] - 67:21, 68:4, 69:13, 75:12, 75:13 signer [2] - 64:15, 64:17 significant [2] - 60:5, signing [1] - 69:15 Singletary [1] - 33:6 sit [2] - 49:22, 56:20 six [1] ~ 6:2 **six-one** [1] - 6:2 sky[1] - 48:13 Social [1] - 6:6 social [2] - 6:25, 7:3 sold [6] - 67:5, 67:11, 68:11, 68:14, 69:3 sole [1] - 36:12 someone [2] - 35:10, 50:8 sometime [1] ~ 59:6 sometimes [3] -11:24, 11:25, 17:5 somewhere [3] - 23:5, 27:5, 52:9 sorry [13] - 18:7, 23:15, 29:7, 29:24, 33:20, 34:19, 39:23, 45:11, 45:24, 59:19, 59:20, 61:23 sort [4] - 7:16, 25:25, 40:24, 57:24 Sosebee [3] - 91:14, 92:22, 92:24 sources [1] - 25:9 speaking [3] - 16:22, 16:24, 17:2 specific [1] - 63:1 spell [3] - 10:14, 23:18, 32:12 sporadic [4] - 31:13, 31:16, 54:24, 58:12 SPRIGGS [30] - 28:22, 40:1, 49:6, 49:10, 49:15, 49:21, 49:25, 50:5, 50:11, 50:14, 50:15, 50:19, 50:22, 61:24, 72:20, 72:24, 73:18, 79:4, 80:15, 80:18, 85:12, 85:15, 85:25, 86:1, 86:3, 86:4, 86:5, 88:8,

92:6, 92:7 Spriggs [23] - 37:24, 38:14, 39:4, 39:19, 39:23, 40:5, 40:15, 44:16, 50:24, 56:5. 57:24, 62:3, 73:1, 73:19, 79:7, 80:21, 84:2, 84:5, 84:9, 84:12, 85:17, 86:7, 86:24 spriggs [1] - 28:23 SPRIGGS.....01 [1] -92:1 square [1] - 9:21 Sr[1] - 43:22 start [2] - 29:2, 58:9 started [9] - 8:6, 8:7, 8:13, 8:16, 9:13, 60:22, 60:24, 63:15, 72:1 state [1] - 35:2 STATE [2] - 90:7, 90:22 State [9] - 37:9, 61:4, 65:25, 76:12, 76:13, 76:17, 81:14, 82:8, 91:15 STATES [1] - 91:1 stay [2] - 38:1, 61:16 still [14] - 8:25, 9:2, 11:15, 13:9, 19:9, 21:18, 25:1, 33:24, 45:3, 45:4, 48:5. 60:20, 77:9 stipend [3] - 59:19, 70:24, 71:8 stipends [1] - 16:14 stipulation [1] - 11:16 stock [1] - 79:12 stop [3] - 62:3, 71:13, 86:12 stopped[5] - 60:13, 60:17, 70:23, 71:8, 71:10 straight [1] - 67:24 Street [6] - 11:17, 67:3, 68:3, 68:8, 69:8, 69:11 street [7] - 8:22, 8:23, 9:12, 9:20, 9:21, 10:22, 11:11 submitted [1] - 91:21 subscribed [1] - 90:14 substitute [4] - 18:1, 62:10, 62:12, 62:16 superior [1] - 39:15 supervise [1] - 76:12 supervises [1] - 76:19 supervisor [3] - 33:9, 33:11 support [4] - 33:15, 33:17, 33:24, 38:15 suppose [1] - 37:14

supposed [1] - 51:4 suspended [2] -55:23, 58:8 suspension [3] - 58:7, 62:4, 65:17 sworn [1] - 91:18

Т taxes [2] - 18:2, 18:23 teacher [2] - 18:1, 62:10 teachers [1] - 62:12 technology [1] - 86:6 TENNESSEE [1] -91:7 term [4] - 62:14, 63:3, 63:4, 63:5 terms [1] - 81;4 territory [1] - 34:25 testimony [2] - 91:19, 92:4 TEXAS [1] - 91:1 Texas [2] - 91:15, 92:23 text [13] - 28:6, 28:12, 28:13, 28:16, 28:21, 30:8, 30:15, 30:18, 31:1, 31:12, 31:21, 74:7, 74:8 texts [6] - 29:1, 31:3, 31:16, 31:17, 74:1, 78:1 THE [7] - 49:20, 72:22, 90:7, 90:22, 91:1, 91:1, 92:6 therefore [1] - 26:21 therein [1] - 90:16 third [1] - 10:5 thousand [1] - 65:20 three [17] - 7:12, 7:20, 14:13, 18:2, 18:22, 27:13, 32:20, 33:1, 33:3, 40:23, 41:1, 41:2, 72:23, 83:25, 85:3, 85:6 Three [1] - 22:24 title [3] - 7:18, 37:4, 69:4 titles [1] - 24:22 today [4] - 79:18, 80:2, 82:23, 83:2 took [2] - 47:1, 61:6 top [1] - 29:8 total [1] - 12:9 totally [2] - 51:6, 51:8 touch [1] - 27:14 train [2] - 86:1, 86:2 training [4] - 35:16, 35:21, 35:22, 35:24 transaction[1] - 69:3

transcript [3] - 91:18,

91:21, 92:13

transferred [2] - 85:2, 85:5 transportation[1] -52:20 trips [1] - 61:18 true [10] - 43:2, 43:14, 51:7, 55:9, 55:13, 56:6, 56:8, 57:11, 90:3, 91:19 trustees [1] - 52:22 truth [5] - 47:9, 86:14, 86:15 try [4] - 12:25, 13:1, 54:16, 78:16 trying [4] - 20:2, 20:3, 50:1, 78:22 turning [1] - 23:6 twice [3] - 36:25, 37:8 two [17] ~ 24:21, 25:1, 25:15, 25:16, 29:20, 47:23, 54:24, 55:1, 58:13, 58:15, 63:15, 63:16, 65:20, 69:25, 72:10, 72:17, 84:7 Two [1] - 21:8 TX[1] - 92:25 type [18] - 8:15, 13:12, 24:18, 26:2, 31:15, 35:24, 36:17, 36:21, 46:3, 48:6, 54:7, 66:1, 74:11, 78:1, 78:10, 79:21, 80:21, 85:18 types [1] - 18:10 typically [1] - 18:8

U ultimately [1] - 68:19

under [4] - 48:4, 50:4, 90:11, 90:17 union [4] - 14:15, 14:19, 83:17, 84:3 UNITED [1] - 91:1 University [1] - 6:18 unless [2] - 37:18, 40:3 UNM [1] - 6:20 up [16] - 9:23, 9:24, 11:12, 13:1, 18:10, 30:23, 38:17, 59:9, 65:17, 75:10, 75:12, 75:13, 78:13, 78:16, 81:9, 88:4 US[1] - 40:24 uses [1] - 52:23 utilities [3] - 62:23,

V

vacant [1] - 37:18 various [2] - 35:25, 36:1

62:24, 63:19

vehicle [3] - 52:18, 52:23, 53:12 vehicles [4] - 52:15, 52:16, 52:17, 53:1 Vicky [3] - 45:3, 45:5, 45:7 video [12] - 47:23, 47:25, 48:1, 48:2, 48:3, 48:9, 48:10, 48:11, 48:14, 48:15, 85:16, 86:18 videos [1] - 48:12 VOICE [1] - 86:10 voice [1] - 41:11 Volvo [2] - 24:25, 25:4 VS [1] - 91:5

W

W-2s [2] - 83:19, 84:9

W-2 [1] - 83:4

wage [3] - 14:10,

34:10, 34:12

walk [1] - 59:9

wall [1] - 81:9

water [1] - 28:24

website [1] - 38:25 week [5] - 12:8, 12:19, 13:1, 13:3, 34:14 weeks [7] - 12:22, 12:23, 12:25, 13:3, 13:5, 63:15, 63:16 wells [2] - 14:20, 14:21 Wells [4] - 15:6, 15:12, 16:1, 83:18 whole [4] - 35:2, 41:6, 82:8, 87:20 wife [8] - 17:8, 17:21, 44:1, 53:17, 64:23, 64:24, 72:2, 85:5 willing [1] - 18:22 witness [11] - 49:9, 49:11, 49:16, 49:18, 85:13, 88:9, 88:11, 91:17, 91:20, 91:22, 91:23 WITNESS 131 - 49:20. 72:22, 89:2 women [2] - 43:24, 53:16 word [7] - 25:25, 56:17, 56:21, 57:17 words [2] - 49:2, 87:22 works [1] - 20:3 workshops [1] - 36:1 world [1] - 42:9 worth [2] - 25:16, 69:22 writing [4] - 80:10, 80:22, 80:25, 81:2

Y

year [15] - 7:5, 26:8. 30:24, 36:18, 36:25, 37:1, 37:8, 38:22, 39:6, 54:24, 55:23, 58:8, 65:18, 78:4 years [23] - 7:12, 7:20, 8:2, 8:4, 8:9, 18:2, 18:22, 23:12, 23:13, 32:2, 33:4, 33:23, 54:21, 54:25, 55:1, 58:14, 58:15, 72:10, 72:17, 73:12, 80:7, 85:3, 85:6 you-all [15] - 10:20, 41:17, 42:2, 42:9, 42:12, 42:16, 65:9, 65:15, 67:10, 67:11, 69:10, 69:15, 69:24, 70:2, 70:15 young [1] - 87:24

Z

zero [2] - 13:5, 69:9 zip [1] - 19:14

	AFFIDAVIT
The State of Texas)
) S.S.
County of Lubbock)

I, Kimberly D. Pollard, of Lubbock, Texas, MAKE OATH AND SAY THAT:

- Prelate in 1994, a few months before my 16th birthday (DOB: 1/29/1979). He was 29 (3/20/1965). At that time, I was spending most of my weekends with a "Mother" figure from my church, First Church of God in Christ, Clovis New Mexico. She did PR work for the Jurisdiction, so they communicated frequently. One particular day, I happen to have answered the phone and that's how he and I began communicating. Once I told him how old I was, he couldn't believe it, he stated that he thought that I was at least 23-25 years in age. He made mention of how mature I was for my age that he could not date me until I turned 18, so until then we could only talk on the phone. Over the next few months we would talk on a regular basis as he still could not believe that I was only 16, he always pointed out that I was so mature and pretty to be so young. We'd see each other during district meetings, fellowships or state meetings around the State: Clovis, Roswell, Las Cruces or Hobbs. He'd also go to Clovis (where I resided) for other reasons, not just for district meetings or state meetings, and we'd see each other as well.
- 2. August 1995 during our annual Holy Convocation in Albuquerque NM, he came to the hotel where I was staying, which was the designated hotel for the meeting. My best friend, Dorcas was with me and so he asked us if we wanted to go with him to run errands, we both said yes. He allowed Dorcas to drive his car, it was an Infiniti Q45 (Rental). He said he needed to stop by the Double Tree Hotel to pick up some fruit/gift baskets that were left by delegates (Exhibits 1 and 42) We pulled into the hotel and he got out and went in. When he came back to the car, he was empty handed and he asked me to go in and help him with the baskets, I went in with him. Once in the room, I grabbed a basket and headed towards the door, only to be stopped by him. He said he needed to ask me something. He said someone had told him that I said we had kissed and was that true, did I in fact tell someone we kissed? My reply was no. He then asked, "So if I kiss you now, would you tell anyone?" I told him no. That's when he kissed me, took the basket out of my hand and lead me over to the bed, we had sex.

He ended up preaching that night and afterwards, I asked him how could he just get up and

preach knowing what we just did? In his response, he told me that a sign of maturity was by not asking a lot of questions and just living life (exhibit 43). My questions irritated him so at that point, I tried to limit my questions about the whole ordeal because I didn't want him to think that I was immature and could not handle the relationship.

I ended up disclosing this information to an individual who was 5 years my senior only because she was making fun of the fact that she didn't think he'd ever had sex and was still a virgin. She promised not to tell anyone but after the meeting concluded and we went back home to Clovis, I found out that she had told my "mother" figure. She called me letting me know what she had heard, how disappointed she was because she spoke to Elder Jones and he said he viewed me only as a little sister, since I was Dorcas' best friend. She also said that she would not tell my mother. A week or so later she ended up telling my mother and when my mother brought it up to me, she stated that me that she was going to have him put in jail. As a 16 year old, in love with him, I did lie and say that we were not sleeping together because I didn't want him to go to jail. By doing that, I then had a scarlet letter carved into my head. He was very upset that I opened my mouth and basically told me that if he wasn't saying anything about it, I shouldn't either. After it all calmed down, we continued and he let me know that if I ever chose to speak about it again, he would always have the upper hand.

- 3. My relationship with the "mother" figure wasn't the same after that so I didn't go to her house anymore. I gave him my house number and that's how we continued to talk or I'd call him with a calling card on a payphone while I was at school (exhibit 51:1, 51:2)) He'd call my house and if I didn't answer, he'd hang up. My mother began to become suspicious about all the hang ups and began to question me about the relationship again. It got to the point to where our relationship became strained. I vented to him about it all the time so he came up with the idea to write my mother a letter so that it would possibly make things amicable between us. In this letter, he stated how rumors, gossip, scandals and lies have always made a path to his name. He expressed to her that I was an amazing youth in the NM Jurisdiction and that I had not done anything wrong. He hoped this would clear up any confusion or anything that was being questioned. After the letter, my mother calmed down a bit but only for a little while, he and I continued. When he'd come to Clovis for visits outside of a District/State Meeting, we'd also see each other, I'd go to his room and we would have sexual intercourse.
- 4. July of 1997, he married Rosalind Sanders and I had no prior knowledge of her at all. I found out about the upcoming nuptials via a church announcement. When I confronted him about he said it was something that he "had" to do but that nothing would change. I was confused by that

because for me it would seem that so much would change because he was getting married. After he married, I did not contact him at all, trying to respect his union but at the same time, deal with the hurt and devastation that it caused for me. 5 months later in December, he called saying that he missed me and us along with other things and so I fell right back a relationship with him. He also made it very clear that I could call him anytime and anywhere, even at home, as he paid all the bills and Rosalind did not hinder him from doing anything, ever (Exhibit) 44).

- 5. August 1998, we met up at yet another state meeting, in Hobbs NM. I waited for him to give me the sign the leave the church, as church service was still going on. When he gave the signal, I left. My friend, Steven Mackey agreed to take me to the Allsups Convenience Store on the outskirts of the city to meet him. We pulled up to the store and he was parked there waiting for me. I got into his Mitsubishi Monterro Sport SUV and we left. We drove around the city for while due to not being able to go to a hotel because of the meeting that was taking place. He decided to park on the side of the road on the outskirts of the city and we had sex (Exhibit 2, 45 and 45a) Afterwards, he drove me to my sisters house. He was right, nothing really changed for us after he got married, we continued as before he was married.
- 6. In 1999 during another state meeting, he came to my city (Clovis) alone, as he often would go to the meetings alone then Rosalind would come towards the end of the meeting. I met him at his hotel and he left the door open for me, we had sex. He decided to leave first and told me to wait 10-15 minutes before I left because a lot of people from Jurisdiction were staying at that hotel, I did as he asked, only to be seen by someone. He later informed me that the late Bishop W. C. Green Sr. told him that when he traveled, he needed to make sure his wife was with him and for him to not be in hotel rooms with me.

July 2000, I moved to Texas. He would come to the State meetings in Texas as New Mexico and the Texas Northwest Jurisdiction often supported each other, he would mostly come without Rosalind and we would be together physically and sexually during those times as well. This happened for at least 2 years. Not every encounter was a sexual one, but most of them were. I was finally able to break away from him after that, our communication came to a halt, with phone calls, emails and texts on each other's birthdays or just small talk casual conversation here and there.

7. November 12, 2014 he messaged me letting me know that he was coming to Lubbock because his mother was in the hospital and that he wanted to see me. He was just flying in from the Holy 003

Convocation. Once he checked into the Overton Hotel, I met him there, Room 1306 (Exhibit 47:1-5). It was there that he discussed in detail about his pending divorce and that how I had always managed to bounce back from all that things he has thrown at me and that if it was the other way around, he didn't think that he could do it, as I had. He said that he wanted to pay me back for the past 20 years of bad regarding our relationship and all that I went through because of him. It was in that room where he talked about he had already started planning for his divorce by moving money to different accounts, he had finally paid off his navigator and put it in the Church name and was going to do the same with his next vehicle.

He discussed wanting to make more memories, right memories with me. And that he viewed me and us differently and took it very seriously now. He explained why he had cursed me out whenever I informed him of my pregnancy. He said it was because he was hurt by it. We discussed how we have grown with each other over the 20 years and how we were in a great place at this time in our relationship. After the conversation, we did have sexual intercourse.

8. December 2014 we met up in Clovis, as he was doing some work at my home church, First Church of God in Christ, Wednesday night bible study. I drove from Lubbock and met him at his hotel room 107 at the Hampton Inn for the night (exhibit 48:1, 48:6)). We spent time together, conversed and then we had sexual intercourse on that night. I left the next day after he left. Our schedules began to be a conflict regarding us being able to physically see each other as well as my daughter "needing love". I initially brought up Skype (Exhibit 49:1-49:2) but was then told about a different application called Glide, so I installed that application, on my phone and invited him to do that same. That helped us somewhat because we were able to talk and see each other more frequently.

For my birthdays and for Valentines Day, he'd always send an edible arrangement or flowers (Exhibit 50:1-50:8). He promised he was going to make things right and was going to show me how serious he was about us, so I believed him.

9. We often discussed the changes that would occur regarding his divorce and our union. He thanked me for hanging in there with him and to trust him (Exhibit 51:1-51:2) things were being handled. As we discussed the financial part of his pending divorce, he made mention of a Bishop in AZ that was going through a divorce in which he was using his process as a blueprint for his own divorce from Rosalind. Stated that he had to pay his wife 65K but then his wife took him back to court for a larger amount. Said that he had to present his case to Bishop Blake (Exhibit 51:3-51:5) and he would decide if he could divorce or not but even with that, he could lose the

church and position. He explained to me that it was a long process so during that, we would just plan.

Towards the end of 2015 while he was in Las Vegas, we had an argument about it and I explained to him then that I was tired of waiting and that he was going to go have to do something to really prove to me that he was working on us being together the right way because 20 years was a long time. Again, he said he would prove it to me and so January 2016 he chose to celebrate my birthday with me. We were going to go to Dallas or El Paso Texas because Bishop Watson was having a conference in Lubbock (exhibit 33). Something came up with a church in Hobbs NM so he chose to spend his time in Lubbock with me. He flew in on that Wednesday, January 27th my birthday was on that Friday, January 29th. When he got in on Wednesday night. He gave me jewelry, let me know that it wasn't for my birthday but that was from Christmas (2015). He also said that he had a lot of tricks up his sleeve. He said I would be so happy that I would cry.

We got a room at the Embassy Suites Hotel (exhibit 52:1) and after getting settled in, we had sex several times and he also gave me my birthday gift which was a Samsung Tablet. I already had one so he said he would take it back and get me jewelry. Exhibits numbered 52:2-52:13 are pictures and videos from my birthday celebration.

After my birthday celebration, I was showing him rings for when the time came, he told me that he would buy what's in the budget (Exhibits 53:1-53:3) He informed me that he was looking forward to celebrating Valentines weekend with no details or any pressure. We were not able to see each other physically but he sent me a floral arrangement and as always, he asked to see a picture of my arrangement or anything that he sent me (Exhibit 50:8).

10. On February 21, 2016 he told me that he would send my daughter, (Exhibit 54). Jireh loved him and had many interactions with him via Glide messaging and over the phone, he was very involved. In the video, he was playing around with her as they always did but then he stopped and then made a very poor judgment in telling her how sexy she looked in her night gown. I responded saying, "Sexy? 6?", he didn't respond. Matter of fact, I didn't hear from him for a few days after that and that was not like him at all. I was very uncomfortable with that but was trying to some how make sense of it and down play it but as the days went by, my eyes began to open and I believed that he was trying to groom my daughter just as he had did me when I was 15. I looked back over the years of involvement with my daughter and the way he treated her and interacted with her, she was his biggest fan so it only left me to believe that this was all strategically planned by him to violate her in the future.

In March, I attended a State Meeting in Clovis, we ended up staying in the same hotel unbeknownst to me because in a prior conversation, he mentioned he had reservations at two of the Hotels there in Clovis. I told him where I was staying and that was it. While at the meeting, he told me, his words, "I am not going to bring any attention to you, I am not going to tolerate anyone looking at you bad because of me. I hope you catch my drift. I believe I trust you more than you know, I pray that it never gets violated, because I'm going to do all I can to keep what we have sealed and between us". After this meeting ended, it was brought to my attention that he was saving that I was his stalker, that I was toxic, unstable and crazy. I was extremely hurt by it and felt that he was only putting that out there in an attempt to try to cover the relationship. I questioned him about it and at first he proceeded to say that he never said it, nor would ever have a reason to say it because of the relationship. After going back and forth as to him saying he never said it to maybe he said it, then to if he said it, he only said it because he was under so much pressure and so on. He knew that I was very upset and so he resorted to his number one fallback which was asking for prayer. That was one of his ways of always reeling me back in. "Pray for me", "You're the only person I trust", "I'm going through so much right now" "I'm always being attacked," "We are prayer partners, we pray for each other". He knew that I would never say no to praying with him or for him.

The additional exhibits 55-66 are from just some of the interactions between him, myself and Jireh. I believe it will offer more support in showing the true nature of our relationship, the comfort level, trust and familiarity between all parties.

SUBSCRIBED AND SWORN TO

BEFORE ME, on the

25th day of July, 2016

BRENDA RODRIGUEZ

Notary Public, State of Texas

Comm. Expires 05-30-2018

NOTARY PUBLIC

My Commission expires: 5/30/2018

()

Kimberly D. Pollard

()

Kimberly D. Pollard